

1 IN THE UNITED STATES DISTRICT COURT
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3 FOR THE EASTERN DISTRICT OF VIRGINIA
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5 ROBERT DAVID STEELE, et al., Case No.: 3:17-cv-00601-MHL
6 Plaintiff,
7 vs.
8 JASON GOODMAN, et al.,
9 Defendant

DEFENDANT'S AMENDED RESPONSE TO
PLAINTIFF'S MOTION FOR RULE 11
SANCTIONS

11 **DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11**
12 **SANCTIONS**

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14 Comes now, Defendant Goodman, Pro Se, with this amended response to Plaintiff's
15 motion for Rule 11 sanctions. This amendment is intended to clarify points raised in Plaintiff's
16 reply and address new information that has come to light since the filing of the initial response to
17 Plaintiff's motion for rule 11 sanctions. Additional evidence of the alleged conspiracy, including
18 strong evidence from multiple unrelated third parties has come to light indicating that counsel for
19 Plaintiff and his wife Tanya Cornwell have directly engaged in barratry, a violation of Virginia
20 State Law § 18.2-45 by aggressively and repeatedly enticing individuals to bring suit against
21 Defendant and others based on false claims. It is Defendant's belief that counsel for Plaintiff
22 engages in barratry as a matter of regular practice and has done the same in the case of Devin
23 Nunes v Twitter et al. Further evidence of additional inappropriate action has come to light and
24 will be described in this pleading.

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28 DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 1

FACTUAL BACKGROUND

1. Plaintiff's Motion for rule 11 sanctions begins asserting the Defendant had "made a fool of himself". This is a statement of opinion and sets an unprofessional, insulting tone for the motion and is an entirely provocative act. It is Defendant's belief this was calculated to elicit the response it got. Plaintiff is suborning behavior he considers sanctionable.
 2. According to Merriam-Webster.com the historic, clinical definition of an "idiot" is someone whose "mental development never exceeds that of a normal child". To describe a public figure who proclaims NASA has enslaved children on Mars as an idiot is a clearly understood matter of opinion and although it may hurt Plaintiff's feelings, this and similar statements are protected first amendment speech.
 3. Plaintiff has publicly stated, without evidence, "*we actually believe that there is a colony on Mars that is populated by children who were kidnapped and sent into space on a 20 year ride. So that once they get to Mars, they have no alternative but to be slaves on the Mars colony.*" This has been previously cited as evidence in this legal matter and reprinted in newspapers and websites around the country. While this might be a statement one could expect a normal, as yet uneducated, or otherwise fanciful child to make, it is not something we would reasonably expect a well-adjusted adult to say, particularly not in a public forum on a broadcast to millions. It remains Defendant's belief that only a person with no ability to differentiate fact from fantasy, possibly with severe mental illness or otherwise defined as a real idiot would make such a statement.
 4. Plaintiff and his attorney have acted in a manner which relies on intimidation, threats and initiation of legal action as a method of attack and to achieve political goals rather than seeking relief for real damages. In a video interview with social media personality David

1 Seaman, Plaintiff clearly articulates this intention (<https://vimeo.com/335290980>) stating
2 *"We are going to take down YouTube and Google and Facebook and Twitter and*
3 *Amazon and Wikipedia and Meetup and then they are all going to pay millions and*
4 *millions and millions of dollars because I am going to personally do my very best to*
5 *inspire with a legal summit ten thousand lawsuits..."* Plaintiff has been doing his best to
6 make good on his promise to waste court resources and tax payer money fighting his own
7 political battles with the civil court system. Biss now represents Congressman Devin
8 Nunes in a series of lawsuits that have been universally derided as baseless attacks on
9 journalism and the first amendment and almost certain to fail on their lack of merits. Biss
10 employs the same overreaching tactics demanding years of tax returns and unnecessary
11 documents via discovery which seem intended to reveal information about opponents to
12 be used against them. (<https://www.fresnobee.com/news/local/article231932983.html>)
13 Defendant maintains the relevance of the Biss / Nunes relationship is a matter of interest
14 in this instant legal action as it serves as another potential piece of evidence of barratry.
15 A defamation case against Twitter for online comments posted by fictional characters (in
16 this case @nunescow and @nunesmom) has virtually no chance of surviving CDA 230
17 and any legitimate lawyer should know this and advise their client. The fact that Nunes is
18 in the unique position to introduce legislation that could modernize CDA 230 makes this
19 a particularly egregious case. Nunes could have been more effective in seeking a remedy
20 with such an approach and is an option a non- congressman would not have.
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- 25 5. On July 4, 2019 David Seaman published a series of videos indicating that he had been
26 represented by Steven S. Biss in a civil suit. The videos are currently on line in their
27 original format at (<https://dlive.tv/p/dlive-29724283+jJh1VmSZg>) and have been
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1 downloaded and preserved by Defendant. (**EXHIBIT A**) In the video, Seaman clearly
2 states "Robert Steele is the one who recommended me to use Biss I had no idea who Biss
3 was and I was going to lunch with Robert Steele shortly after I relocated to DC getting
4 lunch with him where he just emphatically just drilled in drilled in to me that I should get
5 this guy as a lawyer." Seaman has determined that ultimately Biss was not his advocate,
6 but rather sabotaged his case by failing to properly serve his client's needs. Seaman
7 indicates that he believes this was done by Biss to SABOTAGE SEAMAN'S CAREER
8 AS A JOURNALIST. Going after journalists who report unfavorably to his interests has
9 become a pattern and practice for Biss. According to Seaman, Biss abandoned him eight
10 days before his court appearance and instructed Seaman to appear in court Pro Se.
11 Seaman states his belief this was done to expose him to potential sanctions and other
12 confounding matters of legal process as a Pro Se. This also appears to be a standard
13 operating procedure for Biss. Seaman goes on to play an unsolicited voice message from
14 Biss' wife Tanya Cornwell urging him to get in touch with her but warning to remain
15 secretive about her call. Seaman is demanding a refund of his fifteen thousand-dollar
16 (\$15,000) retainer and alleges that Biss, Plaintiff and Cornwell conspired to deceive him.
17 This is substantially the same allegation being made by Defendant and further speaks to
18 the relevance of the facts related to Devin Nunes. It remains Defendant's belief, based on
19 information from a real journalistic source, that the pattern and practice demonstrated by
20 Plaintiff, Biss and their associates, Plaintiff convinced Nunes to seek representation by
21 Biss. The current state of Nunes' suit against Twitter et al, as well as the tremendously
22 negative publicity Nunes has received are consistent with claims made by Seaman, that
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1 Biss' actual goal in representing some clients is to sabotage their case and their public
2 reputation while simultaneously bilking them for huge sums of money.

- 3 6. Defendant does not have any relationship with Seaman and has met him only once at a
4 public event in Washington D.C., on or around March 2017, where they spoke for
5 approximately five minutes. Seaman has come to these conclusions independently.
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- 7 7. On or about June 18, 2019, Manuel Chavez III contacted Defendant and began sharing
8 testimony and email evidence of his relationship and communications with Steven S. Biss
9 and his wife Tanya Cornwell. In these emails, both Cornwell and Biss are persistent in
10 their encouragement of Chavez to sue Goodman based on claims similar to this instant
11 legal action. It is Defendant's belief this violates Virginia State Law Title 18.2. Chapter
12 10. Crimes Against the Administration of Justice » Article 4. Barratry » § 18.2-451.
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- 14 8. Counsel for Plaintiff is in a regular practice of attempting to overwhelm opponents with
15 inappropriate legal action and huge unfounded financial demands for claimed damages.
16 It is Defendant's belief that this is intended to intimidate opponents into submission, very
17 likely through settlement or to otherwise break the financial back of an opponent by
18 forcing them to retain counsel. Defendant has thwarted this by responding pro se and now
19 it seemingly appears the often-censured attorney Biss seeks to confound the Defendant
20 with elements of legal process and by failing to adhere to the most significant rules of
21 procedure, most recently in his improper scheduling of 26f conference. Biss sent a
22 confirmation email to jasongoodman72@protonmail.com. This is NOT an email address
23 provided by Defendant. This is NOT Defendant's email address of record with regard to
24 this or any other matter. This is NOT an email address Defendant has ever
25 communicated with Biss through. This is NOT an email address Defendant has access to.
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1 When no response was received to Biss' request for confirmation, no further attempts
2 were made to confirm the scheduled time with Goodman. Biss proceeded in bad faith,
3 knowing Goodman had never specifically said he would be available on the date and time
4 requested, and Goodman was in fact, not available to confer at the inappropriately
5 scheduled time. It is Defendant's belief that this was done purposefully in an attempt to
6 "get ahead" of Defendant with time consuming legal process which might overwhelm
7 and deadlines, resulting in default or some other advantage for Plaintiff.

- 9 9. Biss was sanctioned by a three judge panel on November 20, 2008 for his role in a
10 "corporate and securities matter, in which he violated professional rules that govern
11 competence, scope of representation" and engaged in "misconduct that involves
12 **DELIBERATELY WRONGFUL ACTS** [emphasis added] that reflect adversely on his
13 fitness to practice." This stern censure speaks directly to Biss' conduct in this instant
14 lawsuit. Defendant directly questions Biss' fitness to practice law or even abide by it.
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16 10. During the one year period of suspension resulting from the above referenced matter,
17 Biss again disregarded the law, orders of the court and any semblance of ethics by
18 continuing "to negotiate with an insurance company on behalf of a client in a personal
19 injury matter." For this violation, Biss was sanctioned another 30 days, and the court
20 found this to be "misconduct that reflects adversely on the lawyer's fitness to practice"
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22 11. On October 18, 2010, the Virginia State Bar Disciplinary Board issued a public
23 reprimand to Biss for violating a professional rule that governs conflict of interest
24 involving a former client. This was an agreed disposition of misconduct charges.
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26 12. On July 24, 2017 in a matter brought by the New York State Department of
27 Environmental Conservation, Stephen Scott Biss and his corporation BissCo Holding,
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1 INC. were found to have committed violations of Articles 17 and 27 of the
2 Environmental Conservation Law of the State of New York and Title 6 of the Official
3 Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR)
4 Parts 360, 372, 374, 612, 613, and 614. A civil penalty of one hundred twenty-two
5 thousand two hundred fifty dollars (\$122,250) was assessed against Biss and BissCo
6 jointly and severally. It remains unclear if Stephen Scott Biss and Steven Scott Biss are
7 one in the same, aliases for an individual or alternately, two different individuals. A
8 “simple google search” for either spelling returns results for both names. More detailed
9 searches with alternate sites focused on background checks or family history display
10 crossover in the results and even list “Stephen Scott Biss” as a “known alias” for Steven
11 Scott Biss. **(EXHIBIT B)** Given the long history of documented and sanctioned frauds
12 perpetrated by Steven Scott Biss, the Defendant was caused to believe the case in 2017 in
13 New York involved him. Biss states this is incorrect. Defendant is unsure of the truth or
14 falsehood of this statement and continues to investigate.

15 13. Defendant made a typographical error in the initial Response to Rule 11 Sanctions (ECF
16 No. 134) accidentally spelling the name of BissCo Holding, Inc CEO Stephen Scott Biss,
17 with a “v” instead of a “ph”. The unintentional spelling error is noted and has been
18 corrected in this amended response. The remarkably coincidental similarity in names of
19 the BissCo CEO and counsel for the Plaintiff have led to confusion. The allegedly
20 inaccurate accusation was refuted by council for Plaintiff Biss in section B of Plaintiff’s
21 Reply (ECF No. 135) titled “Goodman’s Glaring Falsehood”.

22 14. Defendant did not knowingly include a false statement in the pleading, so referring to it
23 as such is inaccurate. Defendant has several reasons to believe Stephen Scott Biss and
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1 Steven Scott Biss may be the same individual or Stephen Scott Biss may be a false or
2 manipulated identity created by or otherwise known to Steven Scott Biss.

3 15. Defendants primary reason for presuming the accusation to be true, beyond the virtually
4 identical names, was the pattern and practice of fraudulent behavior demonstrated
5 throughout the career of Steven S. Biss. Biss was admonished by New York Federal
6 Judge William H. Pauley III for his role in a twenty-one-million-dollar escrow fraud.
7 This infraction alone is serious enough that most individuals would have gone to jail for
8 committing such an act. Biss ignored Bar association sanctions and continued to practice
9 law with a suspended license. These actions speak to the integrity, demeanor and general
10 conduct of Biss, both as an unfit to practice attorney and an immoral person. They
11 illustrate an individual who is willing to do whatever he chooses and whatever is
12 necessary to achieve his desired outcome, irrespective of the law, the truth, facts or
13 ethics. He has demonstrated a pattern and practice of deceptive actions characterized by
14 dishonesty throughout his career that according to court rulings, call his fitness to practice
15 law into question. It is Defendant's hope that this honorable court will keep these
16 important facts in mind when considering the false and outrageous claims of Plaintiff and
17 his totally out of control counsel.

18 16. Upon further examination, Defendant has discovered that BissCo Holdings CEO Stephen
19 S. Biss cannot be located. None of four phone numbers listed on line for Stephen S Biss
20 ring through to a subscriber, all are out of service. Neither Stephen S. Biss nor any
21 representative of BissCo Holdings, Inc. responded to any summons or was present for
22 court proceedings in the dispute in New York State. A phone call to the New York DEC
23 on July 2, 2019 revealed that the lead investigator in this matter, Lieutenant Karen
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1 Staniewsk, has since retired and cannot be contacted. Defendant was instructed by the
2 DEC that any further information could only be obtained through FOIA request. The
3 registered agent for BissCo Holding, Inc is James R. Davies, Esq., at 27 Pearl Street, P.O.
4 Box 2002, Glens Falls, New York, 12801. In a telephone conversation on July 2, 2019
5 Davies confirmed that he was in fact the lawyer for BissCo Holding and had previously
6 communicated with Stephen S Biss. He described him as “medium height, medium
7 build” and “balding”. While not conclusive, these descriptors might be used to identify
8 counsel for Plaintiff. Remarkably, Davies volunteered without being prompted that he
9 recalled some confusion related to the dual spelling of his former client’s name. Davies
10 also stated that he had not communicated with Biss for ten or more years. Davies had
11 attempted to contact his former client in 2017 when the DEC sent summonses. Davies
12 made a specific point, and reiterated it, that he went out of his way to locate Biss in 2017
13 and found it “unusual” that he was unable to reach him. It would seem the only litigant
14 more difficult to locate than Susan Lutzke Holmes is Stephen Scott Biss. Defendant was
15 caused to believe that this use of false identities, confusing identities or possibly
16 manipulated identities could be a method of avoiding civil or other legal matters and
17 there was sufficient evidence to presume the actions carried out by Stephen Scott Biss
18 might be those of Steven Scott Biss. Defendant reiterates the allegation that Plaintiff via
19 his counsel and / or others has conspired with Tut/Lutzke/Holmes to frustrate the
20 Defense. The co-Defendant in question has behaved in substantially the same manner as
21 Stephen Scott Biss, making numerous false statements, ignoring service and failing to
22 appear. While this could be coincidental, Defendant understood this behavior to be an
23 additional element of evidence linking the modus operandi in the two disparate matters.
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1 17. Throughout the course of Plaintiff's solicitation of \$250,000 (two hundred fifty thousand
2 dollars) in charitable contributions to his 501(c)(3) tax exempt corporation, and even to
3 this very day, Plaintiff claims to have written the NATO Open Source Intelligence
4 Handbook despite adamant, credible claims to the contrary. The retired Four-Star U.S.
5 Army General who was in charge of the NATO Southern Atlantic Command at the time
6 of the book's publication has declared Plaintiff's claim "ridiculous" and false. In a
7 telephone interview published on May 1, 2019, Kernan states with no equivocation,
8 Plaintiff's claim of authorship is ridiculous. (**EXHIBIT C**) Defendant has no reason to
9 doubt the General's testimony and many to doubt Plaintiff's. Defendant remains
10 confident in his statement that Plaintiff's claims of writing the Open Source Intelligence
11 Handbook are false, or at least materially misleading. Using such a false claim to entice
12 the public to donate to a 501(c)(3) tax exempt corporation is of course charity fraud.

15 18. Throughout the course of his solicitation of \$250,000 (two hundred fifty thousand
16 dollars) in charitable contributions to his 501(c)(3) tax exempt corporation, Plaintiff
17 claimed to have been "nominated" for a Nobel Peace Prize. The only supportive
18 evidence to substantiate this claim is a PDF document authored by Plaintiff himself,
19 posted to his own web site ([https://robertdavidsteele.com/wp-](https://robertdavidsteele.com/wp-content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-David-Steele.pdf)
20 content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-
21 David-Steele.pdf). Plaintiff has even suggested during this legal proceeding that
22 Defendant should have KNOWN Defendant's own statements to be false, because
23 according to Plaintiff the true facts are contained in this document on Plaintiff's website.
24 Even a cursory examination of the document's properties (**EXHIBIT D**) reveals the
25 "nomination" was in fact written by Plaintiff himself using a nine-year-old version of
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Microsoft Word and an equally antiquated revision of Adobe Acrobat. Since the start of this legal action, and Defendant's vehement public proclamations of Plaintiff's extensive fraud, Plaintiff has taken to revising his language on this particular talking point, referring to it as a "recommendation" for the Nobel prize nomination rather than an actual nomination. This change was made AFTER nearly \$10,000 was contributed to Plaintiff's 501(c)(3) by members of Defendant's viewing audience and after doubts with regard to the veracity of the initial claim were raised in regard to this lawsuit. It is Defendant's belief that Plaintiff has made this revision because Plaintiff is fully aware that falsifying his credentials or falsely embellishing his resumé to entice charitable donations IS CHARITY FRAUD. No actual evidence of a Nobel Peace Prize nomination has been shown and none exists to the best of Defendant's knowledge. Defendant stands by his statements that Plaintiff is both an idiot and a fraud.

19. During a YouTube broadcast that has since been removed from the internet, Plaintiff has publicly declared that discovery in this instant legal action has informed him that Defendant is paid by Israeli Mossad, this is categorically false. The improperly scheduled 26f conference did not take place until May 2019, and no documentation has been produced as yet. Plaintiffs comments were made months prior to May 2019 and Defendant has never received any funding or any payments whatsoever from Israeli Mossad or any related entities to the best of Defendant's knowledge. This is one of the key themes propagated by various members of the conspiracy to defame Defendant.

20. As previously submitted in these proceedings, (ECF No. 78 EXHIBIT I) Intervenor Application D. George Sweigert, telephone Manuel Chavez III, making substantially the same claim, falsely stating that Defendant Goodman was paid by Black Cube

(<http://www.blackcube.com>) a private intelligence firm in the UK comprised of former Mossad agents and operatives, according to their own public website.

21. On or around June 2019, Manuel Chavez III voluntarily shared some of his personal emails with Defendant. Among these were messages Chavez claims are communications from Thomas Shoenberger, an individual unknown to Defendant who may in fact be highly placed in the organization of the monetized conspiracy to harass and defame Defendant Goodman. The emails from Shoenberger provide talking points for a plan to attack Defendant Goodman's reputation with false allegations claiming Goodman is an agent of Israel and / or paid by Mossad.

22. Additionally, Chavez provided communications between Plaintiff, Chavez, Thomas Shoenberger and Tanya Cornwell the wife of counsel for Plaintiff, Steven Biss.

(EXHIBIT E) This email provides evidence that counsel for Plaintiff Biss is using his wife as a “cutout” or conduit through which he can indirectly communicate with the co-conspirators and still provide the plausible claim that “I haven’t spoken with (fill in the name)”. This email provides substantial evidence of the conspiracy alleged by Defendant. A transcript of a publicly broadcast multiparty phone conversation between Simpsons, Chavez, Intervenor Applicant and others has been submitted as evidence previously in this matter (ECF No. 78 EXHIBIT A).

23. Chavez provided an email between Plaintiff and Chavez in which Plaintiff admits he is in direct contact with alleged co-conspirator Tyroan Simpson, (**EXHIBIT F**) and seeks approval from Biss' wife Tanya for communicating with Simpson against Biss' instructions. It would seem Biss had advised Steele not to communicate with Simpson in an effort to hide their collaboration and provide further evidence of conspiracy.

24. In the rule 11 motion, Plaintiff has expressed incredulity at the fact that the mere filing of this legal action, in absence of a judgment, has not stopped Goodman from producing broadcasts that address Plaintiff's abuse of the legal system, Plaintiff's multiple frauds on the public and Plaintiff's ongoing efforts to harass and intimidate Goodman, Goodman's talk show guests and audience. Goodman continues to report and comment on the activities of Plaintiff and his associates as they are matters of public interest.

25. Plaintiff's motion for rule 11 sanctions against Goodman has no basis in fact or law and is yet another in a long series of intimidation tactics intended to distract Defendant from investigative journalism, derail Defendant's reporting on alleged wrongdoing by Plaintiff, and otherwise result in gaining some advantage over Defendant with regard to this legal action.

26. Goodman made statements regarding Biss' association with Congressman Devin Nunes based on information and belief that those statements were true and correct. Goodman remains consistent in that belief. A journalistic source close to Nunes told Goodman directly that Biss was recommended to Nunes by Steele. Shortly after filing the suit against Twitter, Nunes made an appearance on Fox News (https://www.youtube.com/watch?v=U1_c860YIPc) in which he repeated Plaintiff's talking points as articulated in the above referenced David Seaman interview, claiming multiple lawsuits would be filed against Twitter, Google and others. Goodman's claim was made in good faith, and Goodman believes to this day that Plaintiff either directly or indirectly recommended Biss to Nunes or otherwise played some role in connecting the two parties and / or has influence over Nunes' suit via interaction with Biss. Intervenor Applicant has made numerous public calls in now deleted YouTube broadcasts for

1 Congress to open an investigation into the incidents at the Port of Charleston on June 14,
2 2017, despite the FBI's completion of a full investigation. Intervenor Applicant has also
3 publicly proclaimed Devin Nunes will now be somehow compelled to act in response to
4 this instant legal matter. Furthermore, the Nunes/Biss Twitter lawsuit has been
5 universally derided by legal experts on both sides of the political fence for numerous
6 shortcomings, improprieties and obvious legal missteps. Both Twitter and the one non-
7 fictional co-defendant have pointed out that filing in VA state court represents possible
8 venue shopping and / or publicity efforts but is not the appropriate venue given Nunes
9 California residency, Twitter's primary business location and a stipulation in the Twitter
10 EULA that all civil matters are to be adjudicated in California. These substantial
11 deficiencies aside, legal experts consider the action virtually guaranteed to fail given
12 Twitter and all social media networks are currently protected by CDA 230 and suits of
13 this nature have not succeeded since the Digital Millennium Copyright Act came into
14 being in the late 1990s. Any legitimate lawyer with an honest claim should be aware of
15 this, as should any competent member of Congress. A more sensible approach would be
16 to advise a sitting Congressman to introduce legislation to address shortcomings in the
17 arguably obsolete statute as Senator Josh Hawley has done, just this past week.

18 (<https://www.hawley.senate.gov/senator-hawley-introduces-legislation-amend-section-230-immunity-big-tech-companies>) Based on these facts it is Defendant's belief that
19 Counsel for Plaintiff has an ulterior motive in representing Mr. Nunes, possibly as simple
20 and bilking the a potentially gullible representative for money and / or publicity. It
21 should also be noted that the Nunes/Biss suit against Twitter contains allegations against
22 journalists who have authored unfavorable news items about representative Nunes and
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1 has already been amended to eliminate the false claim that specific words in a journalist's
2 tweet where highlighted in bold type. In a recent Fox News interview,
3 (<https://www.techdirt.com/articles/20190411/15061441985/devin-nunes-admits-that-his-bogus-defamation-lawsuits-are-really-about-phishing-journalists-sources.shtml>) Mr.
4 Nunes states "I am absolutely sure that they do not want this to get to discovery so that
5 we find out who their sources are." This statement echoes the underhanded tactics
6 practiced by Plaintiff and his "unfit to practice" attorney. They have demonstrated a
7 pattern and practice of threatening adversaries with discovery and then seeking
8 outrageous overreaching document production in that process. They wield civil legal
9 measures like a weapon and have frequently spoken about using it to get personal,
10 sensitive or otherwise protected information from individuals who they perceive as
11 adversaries. Plaintiff and his attorney falsely believe they can use the discovery process
12 in a fraudulent civil legal matter to pierce the armor of the U.S. Constitution and
13 protection of journalistic sources and the American public's right to a free press and
14 freedom of speech.

15 27. Plaintiff's counsel Steven S. Biss is in the regular practice of flouting the law and
16 encouraging frivolous and vexatious punitive legal action against unfavorable journalists
17 in direct conflict with the first amendment right to free speech. This tactic was used
18 against Jake Morphonios, as revealed by Morphonios' name appearing in the original
19 complaint filed in this matter. (ECF No. 1 page 32 paragraph 26). This error reveals Biss'
20 cut and paste approach to bringing vexatious and frivolous suits against journalists or
21 those seeking to do legitimate investigation into the activities of the clients he represents.
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1 28. Another email provided by Manuel Chavez III reveals not only that Biss' wife Tanya
2 Cornwell, was actively encouraging Chavez to bring suit against Goodman (in lieu of
3 Steele doing so) she is in fact the actual author of the Morphonios lawsuit, and therefore,
4 conceivably at least partly due credit for authoring the original complaint in this instant
5 legal action. (**EXHIBIT G**) In this email Cornwell goes as far as stating "I'm guessing a
6 half a million bucks they will throw at you to just make it go away" clearly stating the
7 intention and expectations of Plaintiff's legal team at the outset of this matter.

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9 29. In a video posted to YouTube on June 23, 2019, Manuel Chavez III revealed that a user
10 with the handle AMABISS had provided him with payments totaling one thousand five
11 hundred dollars (\$1,500) via Patreon on August 1, 2017 at the exact time frame the
12 events detailed in this legal matter where taking place. (**EXHIBIT H**) Chavez has
13 confirmed that username AMABISS is Tanya Cornwell, wife of counsel for Plaintiff
14 Steven S. Biss.

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16 30. Plaintiff Steele has directly and publicly interacted with George Webb Sweigert, brother
17 of Intervenor Applicant both on video
18 (<https://www.youtube.com/watch?v=hMJoAO5OZY8>) and via email as presented in ECF
19 No. 78 Exhibit O)

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21 31. Plaintiff Steele has directly and publicly interacted with Manuel Chavez III on several
22 occasion including on videos still viewable on YouTube
23 (https://www.youtube.com/watch?v=_Xtz_S0tH1g). Plaintiff has also privately
24 communicated with Chavez in a clandestine manner via email as revealed by Manuel
25 Chavez earlier this week.

- 1 32. Chavez is an associate of Intervenor Applicant and has been paid by Intervenor Applicant
2 and has received direct instructions from Intervenor Applicant. Intervenor Applicant
3 operates a YouTube channel under the account name “Prepper Kitty Intel PKI”. Many
4 exhibits in this instant legal matter have referenced this YouTube account. YouTube
5 username Prepper Kitty Intel has paid Chavez via YouTube Superchat (**EXHIBIT I**)
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7 33. Intervenor Applicant has directly and publicly interacted with George Webb Sweigert,
8 Manuel Chavez III, and Tyroan Simpson, evidence of these communications has been
9 provided previously in these pleadings.
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11 34. According to pleadings and public statements by Intervenor Applicant he has interacted
12 with Susan Lutzke/Holmes privately in revealing the identity of O. Marshall Richards
13 and other matters.
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15 35. According to statements by Susan Lutzke/Holmes she has interacted with Intervenor
16 Applicant privately in revealing the identity of O. Marshall Richards and other matters.
17 (<https://www.youtube.com/watch?v=WwyRPFhW-HE>)
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19 36. Counsel for Plaintiff is in a regular practice of ignoring the law, lying to courts, clients,
20 legal adversaries and the public. In 2009, Counsel for Plaintiff had his legal license
21 suspended by the VA State Bar Association for one year. Despite this severe measure,
22 Biss continued to practice law in direct defiance of the order, earning an extended
23 suspension for the transgression. Despite this, Biss continued his unscrupulous and
24 unlawful activity. On July 24, 2017, it was determined that both Counsel for Plaintiff and
25 a corporation owned by Counsel, Bissco Holdings, Inc (“Bissco”) had violated New York
26 State Environmental Conservation regulations. Multiple counts detailed Counsel’s
27 improper disposal of hazardous toxic waste and demonstrated Counsel for Plaintiff’s total
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1 disregard for the law, the environment and the health and safety of the general public.
2 (<https://www.dec.ny.gov/hearings/110879.html>). The New York State Department of
3 Environmental Conservation was awarded default judgements against Steven S. Biss and
4 Bissco In the Matter of the Alleged Violations of Articles 17 and 27 of the Environmental
5 Conservation Law of the State of New York and Title 6 of the Official Compilation of
6 Codes, Rules and Regulations of the State of New York (6 NYCRR) Parts 360, 372, 374,
7 612, 613, and 614. Biss was ordered to pay a civil penalty in the amount of one hundred
8 twenty-two thousand two hundred fifty dollars (\$122,250). (DEC Case No. R5-
9 20120627-2006)

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11 37. Defendant Goodman has never been sanctioned, arrested, accused or charged of any
12 crimes or legal wrongdoing, prior to the allegations of Plaintiff.

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14 38. In Plaintiff's Motion for rule 11 sanctions, Plaintiff claims to have never had any
15 communication with Intervenor Applicant, but then immediately contradicts this claim,
16 stating he has received email communications from Intervenor Applicant. The motion
17 goes on to describe counsel for Plaintiff responding to Intervenor Applicant making this
18 denial of communication and semantic maze to be navigated by anyone trying to
19 determine if there has or has not been communication between parties and / or
20 representatives or intermediaries. To clarify Defendant's claim, while it is clear the
21 alleged co-conspirators have gone out of their way to avoid direct communicaitons
22 between certain parties, there are common connections that allow indirect
23 communications which facilitate the alleged conspiracy and circumvent the capabilities
24 of civil legal matters.

39. On July 7, 2017 Plaintiff sent an email communication to George Webb Sweigert, brother of Intervenor Applicant, stating “A massive law suit is about to be filed against Jason Goodman by a lawyer who specializes in defamation cases. Manny is the one who will be in front” (**EXHIBIT J**) Manny is Manuel Chavez III, one of the individuals who was on the multiparty video chat in which Sweigert agreed to a monetized harassment effort targeting Defendant as presented here in previous pleadings. This email was sent just three weeks after Tanya Cornwell sent the above referenced email to Manuel Chavez III encouraging him to sue Defendant Goodman. It is conceivable that Plaintiff intended to use Chavez as a “cut out” to bring the same type of legal action against Defendant Goodman, subjecting Goodman to the same legal jeopardy and assumed need to hire counsel and subsequent financial ruin, without subjecting himself to the risk of fines for legal fees or other sanctions. It now seems Chavez’ sense of self-preservation prevented him from complying with this plan and may have led to the break in the relationship, and dissention in the ranks of the conspirators.

EGREGIOUS MISCONDUCT BY COUNSEL FOR PLAINTIFF

Thorough examination of the behavior of counsel for Plaintiff is necessary in this matter. Defendant has presented copious evidence that counsel Steven S. Biss, in addition to his long list of career spanning transgressions resulting in numerous sanctions and suspension of his law license, is in fact a co-conspirator with Plaintiff and others in this instant action and is guilty of barratry. Biss worked in coordination with his wife Tanya Cornwell, Plaintiff, Manuel Chavez III and others, engaging in inappropriate behavior leading up to and continuing through the initiation of this law suit. It is Defendant's belief that counsel for Plaintiff knowingly engaged in barratry and even utilized his wife to do so in a likely attempt to avoid implication in these acts.

CONCLUSION

To the best of his knowledge, Defendant has made NO known false statements and has not intentionally misrepresented any facts. Defendant has not presented any known false information or entered any motions or pleadings for improper purpose, nor to harass, cause unnecessary delay, nor needlessly increase the cost of litigation. The exact opposite is in fact the truth. Plaintiff has done each of these things while Defendant has sought to end this matter as quickly and with as little disruption and wasted resources as possible. Plaintiff and his counsel are in the regular practice of instigating lawsuits based on false claims or for bad faith purposes as demonstrated by the public statements of David Seaman. For the above stated reasons, Plaintiff's motion for rule 11 sanctions should be denied, and Defendant Goodman humbly requests that the court consider sanctions against Plaintiff and Counsel Biss as well as a criminal referral to investigate allegations of conspiracy to commit barratry by Plaintiff Robert David Steele, counsel for Plaintiff Steven Scott Biss and Tanya Cornwell. The evidence presented in this pleading speaks for the facts of this matter.

Jason Goodman, Pro Se
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New York, NY 10001
crowdsourcethetruth.org

EXHIBIT A

Transcript of David Seaman Fulcrum News Public Statements on D.Live July 4, 2019

1
00:00:02,120 --> 00:00:08,460
but I just searched for his name on

2
00:00:05,180 --> 00:00:12,269
search for his name on Justia through

3
00:00:08,460 --> 00:00:14,910
the federal court records and you know

4
00:00:12,269 --> 00:00:16,379
it's right there it's not like nobody

5
00:00:14,910 --> 00:00:18,990
sent this to me I didn't pull it out of

6
00:00:16,379 --> 00:00:21,990
a bet it's literally here's his name

7
00:00:18,990 --> 00:00:25,010
Strayu Scott this here's his fucking

8
00:00:21,990 --> 00:00:29,939

9
00:00:25,010 --> 00:00:32,399

10.000-15.000 m² per year, which corresponds to 100-150 ha per year.

twin practices under the same exact name

11
00:00:32.399 --> 00:00:36.719

1 and the same state as him at that time

2 12

3 00:00:34,590 --> 00:00:40,110

4 it appears that he was on the defense

5 13

6 00:00:36,719 --> 00:00:44,129

7 team it appears he was on the defense

8 14

9 00:00:40,110 --> 00:00:47,280

10 team very much so very much so for Bill

11 15

12 00:00:44,129 --> 00:00:49,649

13 Clinton who he was former chief of staff

14 16

15 00:00:47,280 --> 00:00:51,840

16 in the White House was John Podesta and

17 17

18 00:00:49,649 --> 00:00:54,600

19 of course Podesta was also hired by

20 18

21 00:00:51,840 --> 00:00:57,989

22 Hillary to run her campaign so to not

23 19

24 00:00:54,600 --> 00:00:59,879

25 mention to me that his former client was

26 20

27 00:00:57,989 --> 00:01:01,890

28 one of the one of the people that in a

21 21

22 00:00:59,879 --> 00:01:04,680

23 heartbeat I would have said oh no I

24 22

25 00:01:01,890 --> 00:01:07,380

26 can't use you this a lawyer can't use

1 23
2 00:01:04,680 --> 00:01:07,650
you as a lawyer if if this is who you
3
4 24
5 00:01:07,380 --> 00:01:09,780
are
6
7 25
8 00:01:07,650 --> 00:01:13,409
right how can I trust your judgment your
9
10 26
11 00:01:09,780 --> 00:01:15,780
materially compromised so this obviously
12
13 27
14 00:01:13,409 --> 00:01:18,299
has set me back a little bit it makes me
15
16 28
17 00:01:15,780 --> 00:01:19,710
believe less in the swamp I don't think
18
19 29
20 00:01:18,299 --> 00:01:22,049
the swamp has been drained
21
22 30
23 00:01:19,710 --> 00:01:24,840
I think Podesta still being free and
24
25 31
26 00:01:22,049 --> 00:01:26,729
Hillary's still being free and the fact
27
28 32
29 00:01:24,840 --> 00:01:29,130
this man's other client Timothy home
30
31 33
32 00:01:26,729 --> 00:01:31,380
said he won't talk about his other
33
34 00:01:29,130 --> 00:01:35,070

1 client Timothy home Seth where is Tim

2 35

3 00:01:31,380 --> 00:01:37,229
ohmsett air is Tim home set uh so this

4

5 36

6 00:01:35,070 --> 00:01:40,229
isn't right folks this Lanny Davis

7 37

8 00:01:37,229 --> 00:01:42,509
Cepeda gate he just came in and took

9

10 38

11 00:01:40,229 --> 00:01:44,460
fifteen thousand dollars my money and

12

13 39

00:01:42,509 --> 00:01:45,899

what I wanted when I wanted to fire

14

15 40

00:01:44,460 --> 00:01:48,810

months ago

16

17 41

00:01:45,899 --> 00:01:51,180

disgusting Robert David Steele former

19

20 42

00:01:48,810 --> 00:01:52,740

CIA man Robert David Steele is the one

21

22 43

00:01:51,180 --> 00:01:54,960

who convinced me to maintain my

23

24 44

00:01:52,740 --> 00:01:57,540

confidence even though I had none and

26

27 45

00:01:54,960 --> 00:02:00,270

then it was voicemails from Steve mrs.

28

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 24

1 46

00:01:57,540 --> 00:02:02,969

2 wife I'll play you guys one of them was

3 47

4 00:02:00,270 --> 00:02:06,030

5 actually voicemails and unsolicited text

6 48

7 00:02:02,969 --> 00:02:07,890

messages from Steve Biss' wife that

8 49

9 00:02:06,030 --> 00:02:09,929

10 convinced me to have faith in that piece

11 50

12 00:02:07,890 --> 00:02:12,619

of shit for much longer than I should

13 51

14 00:02:09,929 --> 00:02:12,619

have

15 52

16 00:02:14,690 --> 00:02:20,670

17 it really I threw up a little bit

18 53

19 00:02:19,320 --> 00:02:22,980

earlier because it's the done meet here

20 54

21 00:02:20,670 --> 00:02:25,500

22 in DC over the last year it's not right

23 55

24 00:02:22,980 --> 00:02:27,780

they have in mind for me some variation

25 56

26 00:02:25,500 --> 00:02:29,790

27 of what they did to Tim home set right

28 57

00:02:27,780 --> 00:02:32,190

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 25

1 not acceptable with Stephen Scott this

2 58

3 00:02:29,790 --> 00:02:34,740
and what Robert David Steele are doing

4

5 59

6 00:02:32,190 --> 00:02:37,320
to truthers who call out criminals close

7 60

8 00:02:34,740 --> 00:02:39,990
to the Clinton family is simply no

9

10 61

11 00:02:37,320 --> 00:02:41,700
longer acceptable not acceptable at all

12 62

13 00:02:39,990 --> 00:02:44,760
and I've informed one federal agency

14 63

15 00:02:41,700 --> 00:02:46,830
about what Stephen what Stephen visited

16

17 64

18 00:02:44,760 --> 00:02:49,140
and I'm going to inform many many more

19

20 65

21 00:02:46,830 --> 00:02:51,540
have a lot of friends here in DC believe

22

23 66

24 00:02:49,140 --> 00:02:53,480
it or not Stephen Scott BIST he couldn't

25

26 67

27 00:02:51,540 --> 00:02:56,040
even remember if I still lived in DC

28

68

00:02:53,480 --> 00:02:57,810
that's what a bad lawyer the scope so I

1 69
2 00:02:56,040 --> 00:02:59,310
don't know you're still living in DC how

3 70
4 00:02:57,810 --> 00:03:01,740
do you not know where I live when you're

5 71
6 00:02:59,310 --> 00:03:03,360
7 filing cases for me how do you not know

8 72
9 00:03:01,740 --> 00:03:05,490
my jurisdiction to where I live I don't

10 73
11 00:03:03,360 --> 00:03:07,740
12 know you were still in DC okay then

13 74
14 00:03:05,490 --> 00:03:10,590
you're not paying enough attention this

15 75
16 00:03:07,740 --> 00:03:12,540
17 guys filed so many cases right just a

18 76
19 00:03:10,590 --> 00:03:15,270
greedy swamp creature

20 77
21 00:03:12,540 --> 00:03:17,519
22 greedy swamp creature but again to not

23 78
24 00:03:15,270 --> 00:03:19,709
disclose to me that he has worked for

25 79
26 00:03:17,519 --> 00:03:21,630
the Clintons and then the text me

27 80
28 00:03:19,709 --> 00:03:23,430
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 27

1 protects me and to try to Gaslight away

2 81

3 00:03:21,630 --> 00:03:26,280
from this this is very real just eeeh

4

5 82

6 00:03:23,430 --> 00:03:28,760
very real just II a document right here

7 83

8 00:03:26,280 --> 00:03:32,280
you know you can search for it yourself

9

10 84

11 00:03:28,760 --> 00:03:34,470
to try to Gaslight me and to say to me

12 85

13 00:03:32,280 --> 00:03:37,200
let's read the text he texted me back 10

14 86

15 00:03:34,470 --> 00:03:38,010
minutes later I texted him today at 3:40

16

17 87

18 00:03:37,200 --> 00:03:39,930

19 1 p.m.

20 88

21 00:03:38,010 --> 00:03:41,850
don't you think representing the

22 89

23 00:03:39,930 --> 00:03:44,040
Clinton's in the past puts you at a

24 90

25 00:03:41,850 --> 00:03:48,660
material disadvantage in terms of being

26

27 91

28 00:03:44,040 --> 00:03:50,940
objective with my case the Clinton's are

1 92
2 00:03:48,660 --> 00:03:53,130
pedophiles and the employers of the man

3 93
4 00:03:50,940 --> 00:03:55,530
I added John Podesta you should have

5
6 94
7 00:03:53,130 --> 00:03:58,470
disclosed that and so much more he

8 95
9 00:03:55,530 --> 00:03:58,980
responds ten minutes later happy fourth

10
11 96
12 00:03:58,470 --> 00:04:01,799
of July

13 97
14 00:03:58,980 --> 00:04:03,780
you have been fed more bad Intel I have

15
16 98
17 00:04:01,799 --> 00:04:05,640
never represented the Clintons he puts

18 99
19 00:04:03,780 --> 00:04:07,590
Clinton's in quotes for some reason not

20 100
21 00:04:05,640 --> 00:04:09,420
sure why I've never represented the

22
23 101
24 00:04:07,590 --> 00:04:11,090
Clinton sir either of them or any member

25 102
26 00:04:09,420 --> 00:04:13,739
of their family have a good day okay

27
28 103
00:04:11,090 --> 00:04:16,290
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 29

1 well I wasn't fed any Intel I literally

2 104

3 00:04:13,739 --> 00:04:17,040

just searched for your full name on

4 105

5 00:04:16,290 --> 00:04:19,739

6 Justia

7 106

8 00:04:17,040 --> 00:04:21,989

and it appears to match appears to match

9 107

10 00:04:19,739 --> 00:04:24,120

11 where you were practicing at that

12 108

13 00:04:21,989 --> 00:04:25,000

particular moment and time and space

14 109

15 00:04:24,120 --> 00:04:26,530

16 appear

17 110

18 00:04:25,000 --> 00:04:28,450

to match that and unless we're it's some

19 111

20 00:04:26,530 --> 00:04:30,760

kind of weird it's some kind of weird

21 112

22 00:04:28,450 --> 00:04:32,980

23 multiverse which is really beyond the

24 113

25 00:04:30,760 --> 00:04:34,900

scope of this conversation unless that's

26 114

27 00:04:32,980 --> 00:04:40,980

28 the case it seems like this is where you

1 115
2 00:04:34,900 --> 00:04:43,870
were in 1998 it seems very much so so

3 116
4 00:04:40,980 --> 00:04:49,150
you know this is this is highly

5
6 117
7 00:04:43,870 --> 00:04:50,860
problematic and then I I texted them a

8 118
9 00:04:49,150 --> 00:04:52,810
couple of more questions in no response

10
11 119
12 00:04:50,860 --> 00:04:54,910
so we know he got them because he

13 120
14 00:04:52,810 --> 00:04:56,830
responded to the first question no

15
16 121
17 00:04:54,910 --> 00:04:58,870
response to anything else I texted him

18 122
19 00:04:56,830 --> 00:05:01,870
right I said looking at a Justia

20 123
21 00:04:58,870 --> 00:05:05,380
document that says he did I is just eeeh

22
23 124
24 00:05:01,870 --> 00:05:07,690
fake news are you a pedophile what

25 125
26 00:05:05,380 --> 00:05:10,510
happened to Tim home Seth do you have a

27
28 126
00:05:07,690 --> 00:05:13,630
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 31

1 kickback relationship of any kind with

2 127

3 00:05:10,510 --> 00:05:16,330

4 former CIA analyst Robert Steele did you

5 128

6 00:05:13,630 --> 00:05:18,669

7 know you had not even one legal

8 129

9 00:05:16,330 --> 00:05:22,210

10 representative in New York did you know

11 130

12 00:05:18,669 --> 00:05:25,840

13 having me go before an Obama judge pro

14 131

15 00:05:22,210 --> 00:05:27,700

16 se meaning representing myself given the

17 132

18 00:05:25,840 --> 00:05:30,280

19 wording of your lawsuit could have

20 133

21 00:05:27,700 --> 00:05:32,830

22 exposed me to great harm why do you and

23 134

24 00:05:30,280 --> 00:05:36,460

25 your wife target pedo gate journalists

26 135

27 00:05:32,830 --> 00:05:39,760

28 for destruction did you do \$15,000 of

136

00:05:36,460 --> 00:05:45,570

work for me so here's a voicemail from

137

00:05:39,760 --> 00:05:45,570

his wife January 16 of this year

1 138
00:06:33,240 --> 00:06:37,840
2 right she sounds nervous cuz the reason

3 139
00:06:36,310 --> 00:06:38,830
4 why she called me that particular moment
5

6 140
00:06:37,840 --> 00:06:41,409
7 is I

8 141
00:06:38,830 --> 00:06:43,240
9 and it told him I'm not happy with the
10

11 142
00:06:41,409 --> 00:06:45,009
12 representation and some friends of mine

13 143
00:06:43,240 --> 00:06:46,509
14 who are in the legal profession have

15 144
00:06:45,009 --> 00:06:48,819
16 told me that the way you're representing
17

18 145
00:06:46,509 --> 00:06:50,949
19 me is simply not good you're not giving

20 146
00:06:48,819 --> 00:06:53,020
21 me enough time you're not answering very
22

23 147
00:06:50,949 --> 00:06:54,490
24 basic questions that I have and you're

25 148
00:06:53,020 --> 00:06:56,349
26 not making yourself available in a

27 149
00:06:54,490 --> 00:06:57,970
28 DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 33

1 timely fashion and you're making me

2 150

3 00:06:56,349 --> 00:06:59,229

uncomfortable you're making me

4

5 151

6 00:06:57,970 --> 00:07:01,840

uncomfortable with answers that don't

7 152

8 00:06:59,229 --> 00:07:03,340

satisfy me and if answers that

9 153

10 00:07:01,840 --> 00:07:07,180

contradict what you've said to me in the

11

12 154

13 00:07:03,340 --> 00:07:12,129

recent past and so she reached out to me

14

15 155

16 00:07:07,180 --> 00:07:13,990

unsolicited with that phone call isn't

17

18 156

00:07:12,129 --> 00:07:15,819

that weird like why this is secretary

19

157

00:07:13,990 --> 00:07:17,349

trying to be all sneaky with me am I

20

158

00:07:15,819 --> 00:07:17,979

supposed to play this little game with

21

159

00:07:17,349 --> 00:07:21,069

these people

22

160

00:07:17,979 --> 00:07:23,199

I paid \$15,000 I don't want his wife

23

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 34

1 161
00:07:21,069 --> 00:07:24,909
2 calling me oh we respect you so much

3 162
4 00:07:23,199 --> 00:07:28,690
5 this something off about this whole

6 163
7 00:07:24,909 --> 00:07:31,199
experience and what happened to Tim what

8 164
9 00:07:28,690 --> 00:07:31,199
happened

10 165
11 00:07:54,650 --> 00:07:57,720
12 [Music]

13 166
14 00:08:18,330 --> 00:08:25,199
yeah what happened to me and Robert

15 167
16 00:08:21,759 --> 00:08:28,050
17 David Steele is perhaps the most weird

18 168
19 00:08:25,199 --> 00:08:31,000
the most weird part of this whole a

20 169
21 00:08:28,050 --> 00:08:34,690
22 whole episode right so Robert Steele is

23 170
24 00:08:31,000 --> 00:08:36,430
the one who recommended me to use Biss I

25 171
26 00:08:34,690 --> 00:08:37,870
had no idea who Biss was and it was

27 172
28 00:08:36,430 --> 00:08:41,620
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 35

1 going to lunch with Robert Steele

2 173

3 00:08:37,870 --> 00:08:42,669

4 shortly after I relocated to DC getting

5 174

6 00:08:41,620 --> 00:08:45,610

lunch with him where he just

7 175

8 00:08:42,669 --> 00:08:47,140

emphatically just drilled in drilled

9 176

10 00:08:45,610 --> 00:08:50,170

11 into me that I should get this guy as a

12 177

13 00:08:47,140 --> 00:08:57,279

lawyer I did go after it was done to me

14 178

15 00:08:50,170 --> 00:09:00,910

16 and everybody so I just wanna say hi but

17 179

18 00:08:57,279 --> 00:09:02,709

I want to show some stuff on screen so

19 180

20 00:09:00,910 --> 00:09:05,440

here's what I texted Robert Steele

21 181

22 00:09:02,709 --> 00:09:10,870

23 here's what I texted him on Sunday June

24 182

25 00:09:05,440 --> 00:09:13,300

16th at 10:57 a.m. began June 16th of

26 183

27 00:09:10,870 --> 00:09:15,940

this year this is what I texted him

1 184

2 00:09:13,300 --> 00:09:18,790

3 after talking to him talking to him on

4 185

5 00:09:15,940 --> 00:09:19,180

6 the phone in which he started yelling at

7 186

8 00:09:18,790 --> 00:09:21,370

9 me

10 187

11 00:09:19,180 --> 00:09:24,070

12 it started yelling at me after he said

13 188

14 00:09:21,370 --> 00:09:26,529

15 he told me that he and Stephen Biss and

16 189

17 00:09:24,070 --> 00:09:28,660

18 this is almost an exact quote right even

19 190

20 00:09:26,529 --> 00:09:31,990

21 the curse word even the curse word he

22 191

23 00:09:28,660 --> 00:09:33,550

24 used as my memory serves but I don't

25 192

26 00:09:31,990 --> 00:09:36,220

27 remember the exact quotes this is just

28 193

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 37

00:09:33,550 --> 00:09:39,399

my best reconstruction of it he said

194

00:09:36,220 --> 00:09:42,070

that he and this had told home set to

195

00:09:39,399 --> 00:09:42,579

1 keep his fucking mouth shut until the

2 196

3 00:09:42,070 --> 00:09:44,440

4 trial

5 197

6 00:09:42,579 --> 00:09:47,889

he said Tim home Seth is his own worst

7 198

8 00:09:44,440 --> 00:09:49,540

9 enemy and and that he and this I had

10 199

11 00:09:47,889 --> 00:09:51,279

told him to keep his own fucking mouth

12 200

13 00:09:49,540 --> 00:09:53,230

shut and I found both of those

14 201

15 00:09:51,279 --> 00:09:55,149

statements concerning because some of

16 202

17 00:09:53,230 --> 00:09:57,430

18 the cute people in the past when they

19 203

20 00:09:55,149 --> 00:09:59,230

had psychologically attacked me they had

21 204

22 00:09:57,430 --> 00:10:00,670

23 said the same exact thing they had said

24 205

25 00:09:59,230 --> 00:10:02,740

just stop doing what you're doing you

26 206

27 00:10:00,670 --> 00:10:04,540

28 your own worst enemy stop covering this

1 207
2 00:10:02,740 --> 00:10:06,250
stuff you got it wrong and it just

3 208
4 00:10:04,540 --> 00:10:08,620
sounded so similar the wording of it

5 209
6 00:10:06,250 --> 00:10:10,660
7 that it sent a chill down my spine and

8 210
9 00:10:08,620 --> 00:10:14,529
then for him to start yelling at me

10 211
11 00:10:10,660 --> 00:10:16,089
12 after he you know slips up and says says

13 212
14 00:10:14,529 --> 00:10:17,589
that he told Tim home cept to keep his

15 213
16 00:10:16,089 --> 00:10:19,269
17 mouth shut I said to him why are you

18 214
19 00:10:17,589 --> 00:10:21,250
giving legal advice to Tim home Seth

20 215
21 00:10:19,269 --> 00:10:24,430
22 were you working in collusion with

23 216
24 00:10:21,250 --> 00:10:26,260
mystery working as a team to advise Tim

25 217
26 00:10:24,430 --> 00:10:28,120
home Seth you're not an attorney read

27 218
28 00:10:26,260 --> 00:10:30,550

1 Robert steel is not an attorney in any
2 219
3 00:10:28,120 --> 00:10:33,069
shape or form why was he giving Tim home

4
5 220
00:10:30,550 --> 00:10:34,540
6 Seth very sensitive legal advice it

7 221
00:10:33,069 --> 00:10:35,319
8 appears why was he tell him to keep his

9
10 222
00:10:34,540 --> 00:10:36,399
11 fucking mouth shut

12 223
00:10:35,319 --> 00:10:38,290
13 maybe you should have kept his mouth

14 224
00:10:36,399 --> 00:10:40,360
15 open maybe you should have the talking

16
17 225
00:10:38,290 --> 00:10:43,390
18 as loud as possible right maybe Stephen

19 226
00:10:40,360 --> 00:10:45,160
20 Biss is somebody who creeps in there and

21
22 227
00:10:43,390 --> 00:10:47,199
23 tells you to keep quiet until your trial

24 228
00:10:45,160 --> 00:10:49,630
25 well that's exactly the opposite of what

26 229
00:10:47,199 --> 00:10:51,940
27 truthers truth there's a home Seth

28 DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 40

1 230
2 00:10:49,630 --> 00:10:53,470
situation or in my situation the exact

3 231
4 00:10:51,940 --> 00:10:56,019
opposite of what we should be doing and

5 232
6 00:10:53,470 --> 00:10:58,329
this should have disclosed on day one

8 233
9 00:10:56,019 --> 00:10:59,560
you should have disclosed on day one

10 234
11 00:10:58,329 --> 00:11:02,920
that he's represented the Clintons

13 235
14 00:10:59,560 --> 00:11:05,320
before this is this is crazy swamp

15 236
16 00:11:02,920 --> 00:11:06,880
is crazy swap stuff so that's what

18 237
19 00:11:05,320 --> 00:11:08,860
Robert David Steele did is he started

20 238
21 00:11:06,880 --> 00:11:10,000
yelling at me and said I don't like

23 239
24 00:11:08,860 --> 00:11:11,320
where this is heading

25 240
26 00:11:10,000 --> 00:11:13,089
I don't like where this is leading and

27 241
28 00:11:11,320 --> 00:11:14,620

1 then hung up on me right it was the

2 242

3 00:11:13,089 --> 00:11:16,570

4 weirdest thing I've ever encountered

5 243

6 00:11:14,620 --> 00:11:17,889

7 because normally when somebody says to

8 244

9 00:11:16,570 --> 00:11:19,959

10 you I don't like where this is heading

11 245

12 00:11:17,889 --> 00:11:21,970

13 where is this heading what are you

14 246

15 00:11:19,959 --> 00:11:23,740

16 talking about I'm not a prosecutor right

17 247

18 00:11:21,970 --> 00:11:25,389

19 are you are you some scam artist or

20 248

21 00:11:23,740 --> 00:11:26,970

22 something that you give Tim ohmsett bunk

23 249

24 00:11:25,389 --> 00:11:30,070

25 advice but you're not a lawyer at all

26 250

27 00:11:26,970 --> 00:11:31,959

28 right like what does that mean so I sent

29 251

30 00:11:30,070 --> 00:11:33,519

31 him a number of texts after that weird

32 252

33 00:11:31,959 --> 00:11:35,500

34 conversation where again he started

1 253
00:11:33,519 --> 00:11:37,959

2 yelling at me and then hung up on me

3 254

4 00:11:35,500 --> 00:11:39,550

5 which law enforcement if law enforcement

6 255

7 00:11:37,959 --> 00:11:42,579

wants to pull that conversation from

8 256

9 00:11:39,550 --> 00:11:45,339

Sunday June 16th in the morning I would

10 257

11 00:11:42,579 --> 00:11:47,769

12 highly encourage them to do so and they

13 258

14 00:11:45,339 --> 00:11:50,620

15 have my phone number already so here's

16 259

17 00:11:47,769 --> 00:11:52,329

what I texted Robert Steele and I got

18 260

19 00:11:50,620 --> 00:11:55,029

read receipts on the first to you these

20 261

21 00:11:52,329 --> 00:11:57,339

22 read receipts and that on the last two

23 262

24 00:11:55,029 --> 00:12:00,459

it appears he blocked me because no

25 263

26 00:11:57,339 --> 00:12:03,610

27 delivery no delivery receipt on iMessage

28 264

00:12:00,459 --> 00:12:05,709

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 43

1 you know no read receipt either I so

2 265

3 00:12:03,610 --> 00:12:07,420

here's what I texted I don't understand

4

5 266

6 00:12:05,709 --> 00:12:12,130

why you would give legal advice to Tim

7 267

8 00:12:07,420 --> 00:12:14,050

home Seth I don't understand why you

9

10 268

11 00:12:12,130 --> 00:12:16,209

would give legal advice to Tim home Seth

12 269

13 00:12:14,050 --> 00:12:19,870

nor why you referred me to Stephen Biss

14 270

15 00:12:16,209 --> 00:12:22,209

when mr. bists has defrauded me why did

16 271

17 00:12:19,870 --> 00:12:25,390

18 you strongly refer me to him and why the

19 272

20 00:12:22,209 --> 00:12:27,670

mere curiosity why didn't you just hang

21 273

22 00:12:25,390 --> 00:12:29,769

23 up on me no response right but I saw

24 274

25 00:12:27,670 --> 00:12:31,240

Denny read it normally when you ask

26 275

27 00:12:29,769 --> 00:12:33,279

28 somebody why'd you just hang up on me

1 276
2 00:12:31,240 --> 00:12:35,920
aren't I entitled to an answer the man

3 277
4 00:12:33,279 --> 00:12:37,660
who recommended me to my lawyer don't I

5 278
6 00:12:35,920 --> 00:12:39,370
7 deserve an answer as to why he started

8 279
9 00:12:37,660 --> 00:12:41,620
screaming at me and that hangs up on me

10 280
11 00:12:39,370 --> 00:12:44,199
12 this isn't a person I know well it's

13 281
14 00:12:41,620 --> 00:12:45,760
like this is some close friend this is

15 282
16 00:12:44,199 --> 00:12:47,110
17 some close friend who got angry at me

18 283
19 00:12:45,760 --> 00:12:49,120
this is somebody I barely even know

20 284
21 00:12:47,110 --> 00:12:52,240
22 whose professional colleague starts

23 285
24 00:12:49,120 --> 00:12:55,690
screaming at me and then hangs up so I

25 286
26 00:12:52,240 --> 00:12:58,420
27 texted him after that at 4:54 p.m. same

28 287
00:12:55,690 --> 00:13:02,560
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 45

1 day sorry the next day this is Monday

2 288

3 00:12:58,420 --> 00:13:04,779

4 June 17th at 4:54 p.m. and I texted him

5 289

6 00:13:02,560 --> 00:13:07,480

7 over iMessage why did you yell at me

8 290

9 00:13:04,779 --> 00:13:09,250

10 yesterday then hang up on me I was just

11 291

12 00:13:07,480 --> 00:13:11,829

13 asking about your relationship with

14 292

15 00:13:09,250 --> 00:13:13,870

16 Stephen Scott this any professional

17 293

18 00:13:11,829 --> 00:13:15,080

19 relationship you might have aside from

20 294

21 00:13:13,870 --> 00:13:18,110

22 your lawsuit

23 295

24 00:13:15,080 --> 00:13:20,420

25 and was asking about Tim home set whom

26 296

27 00:13:18,110 --> 00:13:23,060

28 you have apparently advised with mr.

29 297

30 00:13:20,420 --> 00:13:25,580

31 bise's help question mark is that

32 298

33 00:13:23,060 --> 00:13:27,140

34 correct for my records no response to

1 299
00:13:25,580 --> 00:13:30,350

2 that one but I saw that he read it on

3 300

4 00:13:27,140 --> 00:13:32,120
the same same day so I followed up and I

5 301

6 00:13:30,350 --> 00:13:34,040

7 said why are you silent on this

8 302

9 00:13:32,120 --> 00:13:39,740
shouldn't we be telling everyone home

10 303

11 00:13:34,040 --> 00:13:41,030

12 Seth needs help and then I my final text

13 304

14 00:13:39,740 --> 00:13:42,980

15 to him the one that was not received

16 305

17 00:13:41,030 --> 00:13:45,440

because I guess he blocked me at that

18 306

19 00:13:42,980 --> 00:13:47,630

point I said your silence as well as

20 307

21 00:13:45,440 --> 00:13:49,610

yelling at me yesterday then hanging up

22 308

23 00:13:47,630 --> 00:13:51,530

24 on me I just don't quite understand it

25 309

26 00:13:49,610 --> 00:13:54,230

especially when you're responsible

27 310

28 00:13:51,530 --> 00:13:57,290

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 47

1 solely for referring me to Steven Scott

2 311

3 00:13:54,230 --> 00:13:58,970
this why are you angry with me why is he

4 312

5 00:13:57,290 --> 00:14:00,800
6 angry with me right I should be angry at

7 313

8 00:13:58,970 --> 00:14:02,630
him wasted a year of my time by

9 314

10 00:14:00,800 --> 00:14:04,880
11 referring me to this lawyer and works by

12 315

13 00:14:02,630 --> 00:14:08,750
himself aside from his wife completely

14 316

15 00:14:04,880 --> 00:14:10,400
16 his own solo practice so why are you

17 317

18 00:14:08,750 --> 00:14:12,350
angry with me I have a few more

19 318

20 00:14:10,400 --> 00:14:13,430
21 questions please call at your earliest

22 319

23 00:14:12,350 --> 00:14:16,010
convenience

24 320

25 00:14:13,430 --> 00:14:18,650
I can also email my questions there is

26 321

27 00:14:16,010 --> 00:14:21,260
no response to that and it was not it

1 322
00:14:18,650 --> 00:14:23,870
2 appears it is not delivered because I've

3 323
00:14:21,260 --> 00:14:25,790
4 been blocked it appears so this is
5

6 324
00:14:23,870 --> 00:14:27,380
7 really this isn't okay folks you know to

8 325
00:14:25,790 --> 00:14:29,540
9 do this to Tim home Seth and he was a
10

11 326
00:14:27,380 --> 00:14:31,570
12 great newspaper reporter and to waste

13 327
00:14:29,540 --> 00:14:35,000
14 the year of my time when I was such a
15

16 328
00:14:31,570 --> 00:14:37,100
17 you know this was such a excited Trump
18

19 329
00:14:35,000 --> 00:14:40,100
supporter back in the day it was so
20

21 330
00:14:37,100 --> 00:14:42,470
excited to move here to DC wasn't really
22

23 331
00:14:40,100 --> 00:14:45,200
24 counting on a year of being worn down by

25 332
00:14:42,470 --> 00:14:49,760
26 people like this but this is not right
27

28 333
00:14:45,200 --> 00:14:52,820
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 49

1 right yeah why is he not angry about my

2 334

3 00:14:49,760 --> 00:15:00,170
4 15 K being taken and I get no no

5 335

6 00:14:52,820 --> 00:15:01,610
7 recourse and I get no justice yeah I

8 336

9 00:15:00,170 --> 00:15:03,170
10 think they were trying to manipulate me

11 337

12 00:15:01,610 --> 00:15:05,750
13 I had a couple of friends look at my

14 338

15 00:15:03,170 --> 00:15:08,360
16 text with my text back and forth with

17 339

18 00:15:05,750 --> 00:15:10,190
this and they said wow this is this is

19 340

20 00:15:08,360 --> 00:15:12,740
21 not normal attorney-client relationship

22 341

23 00:15:10,190 --> 00:15:14,180
and I was like really and they're like

24 342

25 00:15:12,740 --> 00:15:16,730
yeah he's manipulating you

26 343

27 00:15:14,180 --> 00:15:18,080
he's is psychologically manipulating you

28 344

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 50

1 345
2 00:15:18,080 --> 00:15:21,470
shouldn't be trying to alter your

3 346
4 00:15:19,880 --> 00:15:24,680
emotions at all you should just
5

6 347
7 00:15:21,470 --> 00:15:27,170
represent their case you know it's

8 348
9 00:15:24,680 --> 00:15:28,329
certainly for \$15,000 I'm entitled to a
10

11 349
12 00:15:27,170 --> 00:15:30,129
call back

13 350
14 00:15:28,329 --> 00:15:32,619
I'm entitled to a text message right

15 351
16 00:15:30,129 --> 00:15:34,059
17 Steven this appears it appears he lied

18 352
19 00:15:32,619 --> 00:15:37,980
to me today right we showed you that

20 353
21 00:15:34,059 --> 00:15:40,420
22 Justia filing you can find it right here

23 354
24 00:15:37,980 --> 00:15:45,119
there's his name Steven Scott this

25 355
26 00:15:40,420 --> 00:15:47,559
Steven Scopus on the defense team of

27 356
28 00:15:45,119 --> 00:15:51,489
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 51

1 Steven Scott this on the defense team

2 357

3 00:15:47,559 --> 00:15:53,529
for William Jefferson Clinton and the

4 358

5 00:15:51,489 --> 00:15:57,459
place where he was practicing at that

7 359

8 00:15:53,529 --> 00:15:58,809
point in time uh and to text me back and

9 360

10 00:15:57,459 --> 00:16:00,910
say happy fourth of July

11 361

12 00:15:58,809 --> 00:16:02,739
13 you've been fed more bad Intel I have

14 362

15 00:16:00,910 --> 00:16:04,360
16 never represented the Clintons or either

17 363

18 00:16:02,739 --> 00:16:07,509
of them or any member of their family

19 364

20 00:16:04,360 --> 00:16:09,610
have a good day well I wasn't fed this

21 365

22 00:16:07,509 --> 00:16:13,149
23 again I literally just searched for your

24 366

25 00:16:09,610 --> 00:16:15,989
name on Justia and these official court

26 367

27 00:16:13,149 --> 00:16:19,389
records come up and here you are as

1 368
00:16:15,989 --> 00:16:22,470
2 clear as day as clear as a bright sunny

3 369
4 00:16:19,389 --> 00:16:22,470
5 day so

6 370
7 00:16:33,130 --> 00:16:36,130
7 yeah

8 371
9 00:16:36,350 --> 00:16:40,740
9 well that's that's what I want to find

10 372
11 00:16:38,610 --> 00:16:43,290
12 out he's been disbarred before he was

13 373
14 00:16:40,740 --> 00:16:45,300
14 disbarred by Virginia for more than a

15 374
16 00:16:43,290 --> 00:16:47,490
17 year and I've already contacted the

18 375
19 00:16:45,300 --> 00:16:50,040
19 Virginia State Bar about him and I've

20 376
21 00:16:47,490 --> 00:16:52,080
22 contacted one federal agency and I'm

23 377
24 00:16:50,040 --> 00:16:56,040
24 gonna contact so many more it's just

25 378
26 00:16:52,080 --> 00:16:58,410
26 that the way to do things in DC you

27 379
28 00:16:56,040 --> 00:16:59,880
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 53

1 don't want to you don't want a carpetbag

2 380

3 00:16:58,410 --> 00:17:01,410
them you know you don't want to contact

4

5 381

6 00:16:59,880 --> 00:17:04,140
a bunch of different agencies because I

7 382

8 00:17:01,410 --> 00:17:05,910
want to see this first agency look into

9

10 383

11 00:17:04,140 --> 00:17:08,190
Steven Scott this there's a lot of

12

13 384

14 00:17:05,910 --> 00:17:10,230
there's a lot of stuff here you know

15 385

16 00:17:08,190 --> 00:17:12,210
this is not the way to treat another man

17

18 386

19 00:17:10,230 --> 00:17:13,800
the way I was treated by Steven Scott

20 387

21 00:17:12,210 --> 00:17:15,450
this as I've said before in the

22

23 388

24 00:17:13,800 --> 00:17:17,130
newsletter I've never been treated this

25 389

26 00:17:15,450 --> 00:17:18,090
bad by another man before in my entire

27 390

28 00:17:17,130 --> 00:17:22,230
life

1 391
00:17:18,090 --> 00:17:23,610
2 right I mean even John Podesta he didn't

3 392
00:17:22,230 --> 00:17:25,320
4 do anything to me right didn't do
5

6 393
00:17:23,610 --> 00:17:27,600
7 anything to me personally I just

8 394
00:17:25,320 --> 00:17:29,720
9 stumbled across his emails and this is a
10

11 395
00:17:27,600 --> 00:17:32,310
12 guy who personally took my money and

13 396
00:17:29,720 --> 00:17:34,050
14 personally wasted a year of my time and

15 397
00:17:32,310 --> 00:17:35,940
16 may have been leading me to the
17

18 398
00:17:34,050 --> 00:17:38,730
19 slaughter right may have been leading me

20 399
00:17:35,940 --> 00:17:40,920
21 to a fate a very similar to what
22

23 400
00:17:38,730 --> 00:17:42,990
24 happened at Tim home Seth and I can read

25 401
00:17:40,920 --> 00:17:45,570
26 to you guys with a former judge emailed

27 402
00:17:42,990 --> 00:17:48,060
28 DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 55

1 me a friend of ours friend of ours who's

2 403

3 00:17:45,570 --> 00:17:51,690
a former judge if I can find it I'll

4

5 404

6 00:17:48,060 --> 00:17:53,790
read it for you guys I did demand a

7 405

8 00:17:51,690 --> 00:17:55,320
refund and he refused to give one he

9 406

10 00:17:53,790 --> 00:17:57,840
refused to give one and it took him

11

12 407

13 00:17:55,320 --> 00:18:01,290
almost the week took him almost five

14 408

15 00:17:57,840 --> 00:18:02,700
days to produce produce his expenses for

16

17 409

18 00:18:01,290 --> 00:18:04,620
me which is weird because it should just

19 410

20 00:18:02,700 --> 00:18:06,960
be an email away right if you have your

21 411

22 00:18:04,620 --> 00:18:08,640
expenses already reported somewhere you

23 412

24 00:18:06,960 --> 00:18:11,190
should just be able to email it to me it

25 413

26 00:18:08,640 --> 00:18:12,960
shouldn't take four or five days before

27

28 DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 56

1 414
00:18:11,190 --> 00:18:16,680
2 you need to produce that you know before

3 415
4 00:18:12,960 --> 00:18:20,280
5 you're able to produce that so I'm very

6 416
7 00:18:16,680 --> 00:18:22,820
very unhappy with the way these things

8 417
9 00:18:20,280 --> 00:18:22,820
have gone

10 418
11 00:18:46,040 --> 00:18:52,070
12 and multiple times he tried to drop me

13 419
14 00:18:49,460 --> 00:18:53,780
when I needed his help right he did that

15 420
16 00:18:52,070 --> 00:18:56,690
17 in the New York case by eight days

18 421
19 00:18:53,780 --> 00:18:58,370
before saying hey up dear gonna be goin

20 422
21 00:18:56,690 --> 00:19:01,040
22 pro se up in New York gonna be

23 423
24 00:18:58,370 --> 00:19:03,500
representing yourself before this Obama

25 424
26 00:19:01,040 --> 00:19:06,380
appointed judge Obama appointed federal

27 425
28 00:19:03,500 --> 00:19:08,300
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 57

1 judge and he said to me he was he was

2 426

3 00:19:06,380 --> 00:19:09,950

4 kind of trying to stress me out he was

5 427

6 00:19:08,300 --> 00:19:11,840

7 trying to stress me out on the phone to

8 428

9 00:19:09,950 --> 00:19:14,360

10 me I said to him is this a bad thing

11 429

12 00:19:11,840 --> 00:19:17,000

13 that she's an Obama appointee and he

14 430

15 00:19:14,360 --> 00:19:20,090

16 said well you better hope that she hates

17 431

18 00:19:17,000 --> 00:19:22,310

19 The Daily Beast better hope that she

20 432

21 00:19:20,090 --> 00:19:24,650

22 hates The Daily Beast more than she

23 433

24 00:19:22,310 --> 00:19:26,720

25 hates you and I said to him at the time

26 434

27 00:19:24,650 --> 00:19:28,670

28 what does that mean what does that mean

29 435

30 00:19:26,720 --> 00:19:30,410

31 you're my lawyer better hope she hates

32 436

33 00:19:28,670 --> 00:19:31,880

34 The Daily Beast more than she hates me

1 437
2 00:19:30,410 --> 00:19:33,440
why would he hate me at all

3 438
4 00:19:31,880 --> 00:19:35,870
I mean I'm sorry why would she hate me

5
6 439
7 00:19:33,440 --> 00:19:37,760
at all for outing a potential child

8 440
9 00:19:35,870 --> 00:19:39,500
trafficker based on WikiLeaks emails

10
11 441
12 00:19:37,760 --> 00:19:41,450
that are very credible why would she

13 442
14 00:19:39,500 --> 00:19:43,250
hate that for filing a defamation case

15
16 443
17 00:19:41,450 --> 00:19:46,130
because I don't like being smeared on

18 444
19 00:19:43,250 --> 00:19:48,740
the basis of my research which is just

20 445
21 00:19:46,130 --> 00:19:50,120
reading some WikiLeaks emails why would

22
23 446
24 00:19:48,740 --> 00:19:53,530
why would that be the outcome why would

25 447
26 00:19:50,120 --> 00:19:53,530
I be hated and

27
28 448
00:20:12,720 --> 00:20:18,800
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 59

1 yeah I'm afraid I'm afraid that was the

2 449

3 00:20:15,800 --> 00:20:18,800

scenario

4 450

5 00:20:36,330 --> 00:20:42,930

6 all right so here's I found it sorry for

7 451

8 00:20:38,460 --> 00:20:45,360

the play this is from a friend of ours

9 452

10 00:20:42,930 --> 00:20:50,090

11 who's a former judge and current

12 453

13 00:20:45,360 --> 00:20:50,090

practicing attorney and he wrote to me

14 454

15 00:21:06,480 --> 00:21:09,680

16 can't find it more

17 455

18 00:21:16,700 --> 00:21:21,769

all right here we go I found it he said

19 456

20 00:21:19,460 --> 00:21:23,720

rule 11 is for filing or continuing with

21 457

22 00:21:21,769 --> 00:21:25,399

23 a lawsuit when it is frivolous the

24 458

25 00:21:23,720 --> 00:21:27,769

defendants attorneys would have sent you

26 459

27 00:21:25,399 --> 00:21:30,409

28 a letter as a pro se to drop the lawsuit

1 460
00:21:27,769 --> 00:21:32,809
2 in her face spines normally it would not

3 461
4 00:21:30,409 --> 00:21:35,330
5 apply an effect based situation but with

6 462
7 00:21:32,809 --> 00:21:37,549
an Obama judge it was the real

8 463
9 00:21:35,330 --> 00:21:39,950
possibility in my opinion what your

10 464
11 00:21:37,549 --> 00:21:43,519
12 lawyer did to you is disgusting if you

13 465
14 00:21:39,950 --> 00:21:44,359
pay it any money demand a full refund so

15 466
16 00:21:43,519 --> 00:21:46,309
17 again one more time

18 467
19 00:21:44,359 --> 00:21:49,700
this is friend of mine whose former

20 468
21 00:21:46,309 --> 00:21:52,220
22 judge and current attorney an attorney

23 469
24 00:21:49,700 --> 00:21:54,109
here on the East Coast a rule evidence

25 470
26 00:21:52,220 --> 00:21:56,119
for filing or continuing with a lawsuit

27 471
28 00:21:54,109 --> 00:21:57,499
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 61

1 when it is frivolous the defendants

2 472

3 00:21:56,119 --> 00:22:00,230
attorneys would have sent you a letter

4

5 473

6 00:21:57,499 --> 00:22:02,539
as a pro se to drop the lawsuit or face

7 474

8 00:22:00,230 --> 00:22:04,759
fines normally it would not apply an

9 475

10 00:22:02,539 --> 00:22:06,859
effect based situation but with an Obama

11

12 476

13 00:22:04,759 --> 00:22:09,019
judge it was a real possibility in my

14 477

15 00:22:06,859 --> 00:22:11,629
opinion what your lawyer did to you is

16 478

17 00:22:09,019 --> 00:22:15,440
disgusting if he paid any money demand a

19 479

20 00:22:11,629 --> 00:22:17,929
full refund and Stephen BIST also

21 480

22 00:22:15,440 --> 00:22:19,730
threatened to sue me threatened to sue

23

24 481

25 00:22:17,929 --> 00:22:22,070
me when I explained him that this is

26 482

27 00:22:19,730 --> 00:22:23,809
simply not acceptable right this is not

28

1 483
00:22:22,070 --> 00:22:26,029
2 acceptable treatment of another human

3 484
4 00:22:23,809 --> 00:22:27,710
5 being and certainly when you used to

6 485
7 00:22:26,029 --> 00:22:29,330
work with the Clintons it's not

8 486
9 00:22:27,710 --> 00:22:31,070
acceptable treatment of the person he

10 487
11 00:22:29,330 --> 00:22:33,279
12 brought down John Podesta right there's

13 488
14 00:22:31,070 --> 00:22:41,419
a material conflict of interest here and

15 489
16 00:22:33,279 --> 00:22:44,480
17 it's simply unacceptable and here's

18 490
19 00:22:41,419 --> 00:22:46,190
here's the threat from Steven bish I'll

20 491
21 00:22:44,480 --> 00:22:52,129
22 bring it up on screen so you guys can

23 492
24 00:22:46,190 --> 00:22:53,330
see it there's his threat so this is

25 493
26 00:22:52,129 --> 00:22:55,570
what this guy meant to be just

27 494
28 00:22:53,330 --> 00:22:57,379

1 intimidating me at every step of the way

2 495

3 00:22:55,570 --> 00:22:58,820

4 intimidating needed every step of the

5 496

6 00:22:57,379 --> 00:22:59,720

7 way and if he thought that I wanted out

8 497

9 00:22:58,820 --> 00:23:01,820

10 what he's done

11 498

12 00:22:59,720 --> 00:23:03,529

13 I'm the person who outed John Podesta so

14 499

15 00:23:01,820 --> 00:23:05,779

16 he's absolutely wrong I don't like

17 500

18 00:23:03,529 --> 00:23:08,090

19 having \$15,000 in the year of my time

20 501

21 00:23:05,779 --> 00:23:09,919

22 wasted and being constantly stressed out

23 502

24 00:23:08,090 --> 00:23:13,759

25 when now I realize that they have been

26 503

27 00:23:09,919 --> 00:23:16,820

28 theatrics theatrics between him and fat

29 504

30 00:23:13,759 --> 00:23:19,249

31 hog Robert David Steele just to stress

32 505

33 00:23:16,820 --> 00:23:23,869

34 me out not to help me out to stress me

1 506
2 00:23:19,249 --> 00:23:26,210
out so here's what Stephen abyss texted

3 507
4 00:23:23,869 --> 00:23:28,340
me and I have copies of this with

5 508
6 00:23:26,210 --> 00:23:30,080
7 multiple people it's backed up all over

8 509
9 00:23:28,340 --> 00:23:30,600
the place here to put a bullet in my

10 510
11 00:23:30,080 --> 00:23:32,370
12 head

13 511
14 00:23:30,600 --> 00:23:34,500
it wouldn't impact the availability of

15 512
16 00:23:32,370 --> 00:23:37,700
17 this information at all and again I'm

18 513
19 00:23:34,500 --> 00:23:39,960
contacting everybody absolutely

20 514
21 00:23:37,700 --> 00:23:42,930
everybody just giving it time because I

22 515
23 00:23:39,960 --> 00:23:45,990
24 want to see if that first agency that

25 516
26 00:23:42,930 --> 00:23:48,180
first agency can do something David I

27 517
28 00:23:45,990 --> 00:23:49,080
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 65

1 know who you have talked to and what

2 518

3 00:23:48,180 --> 00:23:50,700

4 you've said

5 519

6 00:23:49,080 --> 00:23:53,010

7 I have voiced recordings of the

8 520

9 00:23:50,700 --> 00:23:55,140

10 falsehoods what a creep what does that

11 521

12 00:23:53,010 --> 00:23:57,750

13 even mean you fucking creep does that

14 522

15 00:23:55,140 --> 00:23:59,250

16 mean you watch the live stream does that

17 523

18 00:23:57,750 --> 00:24:01,950

19 mean you used to work for the Clinton

20 524

21 00:23:59,250 --> 00:24:03,510

22 sin you're a fucking midget creep David

23 525

24 00:24:01,950 --> 00:24:04,260

25 I know who you have talked to and what

26 526

27 00:24:03,510 --> 00:24:06,740

28 you've said

29 527

30 00:24:04,260 --> 00:24:10,290

31 I have voice recordings of falsehoods

32 528

33 00:24:06,740 --> 00:24:12,480

34 tomorrow I will prepare invoices and

1 529
2 00:24:10,290 --> 00:24:14,550
final accountings I will count to you

3 530
4 00:24:12,480 --> 00:24:16,980
for every task performed and every

5 531
6 00:24:14,550 --> 00:24:20,150
7 minute of my time I assure you all time

8 532
9 00:24:16,980 --> 00:24:23,190
will be accounted for from the flat fee

10 533
11 00:24:20,150 --> 00:24:26,070
12 \$15,000 I will deduct the actual hours

13 534
14 00:24:23,190 --> 00:24:28,530
spent on your cases and will refund any

15 535
16 00:24:26,070 --> 00:24:31,140
17 balance left after payment of my fees if

18 536
19 00:24:28,530 --> 00:24:34,230
there is any dispute after you review my

20 537
21 00:24:31,140 --> 00:24:37,830
final invoices and accountings I will

22 538
23 00:24:34,230 --> 00:24:40,710
24 see you and deposit the 15k in court

25 539
26 00:24:37,830 --> 00:24:43,650
pending a determination of what fees you

27 540
28 00:24:40,710 --> 00:24:46,110

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 67

1 owe I will not dignify your unjustified

2 541

3 00:24:43,650 --> 00:24:48,510

4 personal attacks have a good day and

5 542

6 00:24:46,110 --> 00:24:50,490

I've talked I've talked to friends in

7 543

8 00:24:48,510 --> 00:24:51,990

9 the legal profession and every single

10 544

11 00:24:50,490 --> 00:24:54,450

one of them has even told me that this

12 545

13 00:24:51,990 --> 00:24:56,670

is bizarre right that normally attorneys

14 546

15 00:24:54,450 --> 00:24:59,250

16 don't threaten to sue you when you ask

17 547

18 00:24:56,670 --> 00:25:01,800

to see some breakdown of expenses right

19 548

20 00:24:59,250 --> 00:25:04,140

21 I don't feel that \$15,000 of work was

22 549

23 00:25:01,800 --> 00:25:06,270

done and I wanted to see what it is that

24 550

25 00:25:04,140 --> 00:25:07,890

he had done and I'm not convinced that

26 551

27 00:25:06,270 --> 00:25:09,960

28 what he sent me was satisfactory

1 552
2 00:25:07,890 --> 00:25:11,490
and I'm not convinced that the amounts

3 553
4 00:25:09,960 --> 00:25:16,020
are accurate because it seems like he's

5 554
6 00:25:11,490 --> 00:25:17,250
7 done very little work yeah and what's so

8 555
9 00:25:16,020 --> 00:25:18,900
bad about what he did is he told me to

10 556
11 00:25:17,250 --> 00:25:21,630
12 be quiet the whole time I could have

13 557
14 00:25:18,900 --> 00:25:23,850
raised hell here in DC I could have

15 558
16 00:25:21,630 --> 00:25:25,860
17 raised absolute hell and he told me to

18 559
19 00:25:23,850 --> 00:25:28,590
be quiet for a year now I've lost my

20 560
21 00:25:25,860 --> 00:25:30,930
22 audience thank God the 20 disciples are

23 561
24 00:25:28,590 --> 00:25:32,190
always here no the 20 viewers are always

25 562
26 00:25:30,930 --> 00:25:35,220
here thank you guys so much

27 563
28 00:25:32,190 --> 00:25:37,020

1 you're my extended family but you know

2 564

3 00:25:35,220 --> 00:25:39,180

4 like they knocked me out I was actually

5 565

6 00:25:37,020 --> 00:25:40,740

making a difference in the world we had

7 566

8 00:25:39,180 --> 00:25:43,590

9 hundreds of thousands of people is

10 567

11 00:25:40,740 --> 00:25:44,160

sending this stuff instead of 20 20 or

12 568

13 00:25:43,590 --> 00:25:54,360

21

14 569

15 00:25:44,160 --> 00:25:57,480

16 or 22 right that was that was sort of my

17 570

18 00:25:54,360 --> 00:25:59,100

question yeah how is that not a threat

19 571

20 00:25:57,480 --> 00:26:01,140

especially when he's an attorney when

21 572

22 00:25:59,100 --> 00:26:02,760

23 I'm stressed out when I'm stressed out

24 573

25 00:26:01,140 --> 00:26:04,200

he knows that I'm down to the last of my

26 574

27 00:26:02,760 --> 00:26:06,000

resources he knows what I've been

1 575
2 00:26:04,200 --> 00:26:08,820
through more than anybody because he had

3 576
4 00:26:06,000 --> 00:26:10,680
me take him through it in detail to have

5 577
6 00:26:08,820 --> 00:26:12,750
a guy who used to work for the Clintons

8 578
9 00:26:10,680 --> 00:26:15,000
to have him pick apart everything

10 579
11 00:26:12,750 --> 00:26:16,650
everything relevant to what's been done

13 580
14 00:26:15,000 --> 00:26:18,660
to you and to give over all this

15 581
16 00:26:16,650 --> 00:26:20,850
information and then to find out that

18 582
19 00:26:18,660 --> 00:26:22,830
he's not your advocate it's like finding

20 583
21 00:26:20,850 --> 00:26:24,540
out that your therapist was a predator

23 584
24 00:26:22,830 --> 00:26:26,400
you know that's like finding out you've

25 585
26 00:26:24,540 --> 00:26:29,550
had a predatory therapist it's like hey

27 586
28 00:26:26,400 --> 00:26:32,040
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 71

1 this ain't this ain't okay but grateful

2 587

3 00:26:29,550 --> 00:26:33,900

4 grateful because what this guy has done

5 588

6 00:26:32,040 --> 00:26:35,280

7 to me is so bad I don't even care about

8 589

9 00:26:33,900 --> 00:26:37,320

10 John Podesta anymore

11 590

12 00:26:35,280 --> 00:26:39,660

13 Red John Podesta could walk by me on the

14 591

15 00:26:37,320 --> 00:26:42,420

16 sidewalk later today and I would just

17 592

18 00:26:39,660 --> 00:26:44,790

19 wave because he's done nothing to me

20 593

21 00:26:42,420 --> 00:26:46,890

22 personally in fact I probably fucked up

23 594

24 00:26:44,790 --> 00:26:49,290

25 his whole life he was an Illuminati

26 595

27 00:26:46,890 --> 00:26:51,180

28 pedalboard paradise land you know I

596

00:26:49,290 --> 00:26:52,410

probably fucked up his life by sticking

597

00:26:51,180 --> 00:26:54,420

to that story

1 598

2 00:26:52,410 --> 00:26:57,240

so Podesta's done nothing to me

3 599

4 00:26:54,420 --> 00:26:59,370

5 personally as far as I can tell this guy

6 600

7 00:26:57,240 --> 00:27:01,560

wasted a year of my time how do we make

8 601

9 00:26:59,370 --> 00:27:03,120

10 this right and again to threaten me when

11 602

12 00:27:01,560 --> 00:27:04,560

13 even giving back half of that money

14 603

15 00:27:03,120 --> 00:27:06,330

16 would have made such a difference to be

17 604

18 00:27:04,560 --> 00:27:09,930

19 mentally so I feel like I didn't get

20 605

21 00:27:06,330 --> 00:27:12,120

22 totally just fucking totally grifted you

23 606

24 00:27:09,930 --> 00:27:14,640

know it's the solo lawyer who just

25 607

26 00:27:12,120 --> 00:27:18,330

27 totally took advantage of me and his

28 608

00:27:14,640 --> 00:27:20,670

wife that number bounces by the way his

609

00:27:18,330 --> 00:27:34,980

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 73

1 wife leaving those voicemails I've tried

2 610

3 00:27:20,670 --> 00:27:38,250

4 to call that number back here it's not

5 611

6 00:27:34,980 --> 00:27:42,240

7 wild isn't that wild and then here's the

8 612

9 00:27:38,250 --> 00:27:45,240

10 voicemail from Stephen Miss 1228

11 613

12 00:27:42,240 --> 00:27:47,490

13 December 28th of last year that gives

14 614

15 00:27:45,240 --> 00:27:49,350

16 you an idea of how he tried how do you

17 615

18 00:27:47,490 --> 00:27:51,240

19 try to shake me up I know there's a

20 616

21 00:27:49,350 --> 00:27:53,820

22 problem you gotta call me there's just

23 617

24 00:27:51,240 --> 00:27:56,700

25 drama just drama between him and steel

26 618

27 00:27:53,820 --> 00:27:57,250

28 trying to drive me under but now we get

29 619

30 00:27:56,700 --> 00:27:59,170

31 a hundred

32 620

33 00:27:57,250 --> 00:28:01,840

34 thousand times louder go to massive

1 621
2 00:27:59,170 --> 00:28:04,330
3 fucking pedophile Podesta's every report

4 622
5 00:28:01,840 --> 00:28:06,220
6 Robert David steel everywhere necessary

7 623
8 00:28:04,330 --> 00:28:08,020
9 until he's disbarred for life from the

10 624
11 00:28:06,220 --> 00:28:09,550
12 legal profession because again I've

13 625
14 00:28:08,020 --> 00:28:11,710
15 talked to enough people who have told me

16 626
17 00:28:09,550 --> 00:28:14,320
18 that this guy was predatory to me I'm

19 627
20 00:28:11,710 --> 00:28:15,670
21 not I'm not a little girl right now but

22 628
23 00:28:14,320 --> 00:28:17,710
24 enough people have told me he's been a

25 629
26 00:28:15,670 --> 00:28:39,520
27 predator a professional predator that

28 630
29 00:28:17,710 --> 00:28:41,230
30 I'm starting to believe and that that

31 631
32 00:28:39,520 --> 00:28:43,420
33 procedural issue by the way if I

34 632
35 00:28:41,230 --> 00:28:45,310
36 DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 75

1 remember correctly was him telling me

2 633

3 00:28:43,420 --> 00:28:47,260

4 that Jennings Brown would have to be

5 634

6 00:28:45,310 --> 00:28:49,660

dropped as a defense did right the

7 635

8 00:28:47,260 --> 00:28:51,520

person that I wanted to sue cuz he's the

9 636

10 00:28:49,660 --> 00:28:54,040

11 person who wrote the article about me

12 637

13 00:28:51,520 --> 00:28:55,870

had to be dropped as a defendant this is

14 638

15 00:28:54,040 --> 00:28:57,250

16 that competent law fair right there oh

17 639

18 00:28:55,870 --> 00:28:58,780

we got it we gotta drop the lawsuit

19 640

20 00:28:57,250 --> 00:29:00,340

against the guy that you want to sue

21 641

22 00:28:58,780 --> 00:29:02,290

23 he's the guy who wrote the article

24 642

25 00:29:00,340 --> 00:29:04,450

instead we're gonna sue just the parent

26 643

27 00:29:02,290 --> 00:29:06,760

company just the company that owns the

1 644
00:29:04,450 --> 00:29:07,930
2 Daily Beast and The Daily Beast okay

3 645
4 00:29:06,760 --> 00:29:09,970
5 well don't you know that is a lawyer

6 646
7 00:29:07,930 --> 00:29:12,580
8 don't you know how to add somebody as

9 647
10 00:29:09,970 --> 00:29:13,920
11 offended and not have it be fucked up

12 648
13 00:29:12,580 --> 00:29:16,690
14 haven't you been doing this for decades

15 649
16 00:29:13,920 --> 00:29:19,260
17 you know I have it even filing lawsuits

18 650
19 00:29:16,690 --> 00:29:19,260
20 for that goods

21 651
22 00:29:37,830 --> 00:29:45,529
23 a student from 10 12:30 on Friday you

24 652
25 00:29:41,970 --> 00:29:51,299
26 call is necessary to talk to families

27 653
28 00:29:45,529 --> 00:29:53,610
about just some procedural issues on the

654
00:29:51,299 --> 00:29:59,580
precip you have to file today so give me

655
00:29:53,610 --> 00:30:02,009
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 77

1 a call when you get this message back ya

2 656

3 00:29:59,580 --> 00:30:09,360

4 know 20 people is correct 20 people it's

5 657

6 00:30:02,009 --> 00:30:14,369

7 more than enough I mean I'm seeing 156

8 658

9 00:30:09,360 --> 00:30:16,739

10 comments so far 156 comments so I mean

11 659

12 00:30:14,369 --> 00:30:18,389

13 how is it still 19 people watching you

14 660

15 00:30:16,739 --> 00:30:27,539

16 guys might be right might be more

17 661

18 00:30:18,389 --> 00:30:30,539

19 numbers than that I realize it's not

20 662

21 00:30:27,539 --> 00:30:32,730

22 Trump's job it's not Trump's job to look

23 663

24 00:30:30,539 --> 00:30:35,669

25 out for everybody who supports him and I

26 664

27 00:30:32,730 --> 00:30:38,460

28 realized he's not like not like the MOG

29 665

30 00:30:35,669 --> 00:30:40,470

31 and dad but he sort of is right he's let

32 666

33 00:30:38,460 --> 00:30:42,480

34 all of us go under and it would have

1 667
2 00:30:40,470 --> 00:30:44,879
taken all of a minute to cleared up this

3 668
4 00:30:42,480 --> 00:30:46,409
Podesta stuff right to clear this up to

5 669
6 00:30:44,879 --> 00:30:47,730
7 put that piece of shit in prison at this

8 670
9 00:30:46,409 --> 00:30:49,980
point would have taken all of a minute

10 671
11 00:30:47,730 --> 00:30:53,159
12 instead it's the slow and methodical

13 672
14 00:30:49,980 --> 00:30:55,080
takedown of every single one of us right

15 673
16 00:30:53,159 --> 00:30:57,210
17 to home Seth was one of my favorite

18 674
19 00:30:55,080 --> 00:30:59,669
people listen to you about this pedo

20 675
21 00:30:57,210 --> 00:31:05,549
22 gate stuff was one of my favorite people

23 676
24 00:30:59,669 --> 00:31:07,950
listened to and now he's either rotting

25 677
26 00:31:05,549 --> 00:31:10,619
in jail in Crookston Minnesota where has

27 678
28 00:31:07,950 --> 00:31:13,019
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 79

1 disappeared and you know as of just

2 679

3 00:31:10,619 --> 00:31:15,809

4 earlier today Stephen Scott Busse is

5 680

6 00:31:13,019 --> 00:31:17,970

7 still not answering my extremely simply

8 681

9 00:31:15,809 --> 00:31:19,649

10 worded question I'm not trying to be

11 682

12 00:31:17,970 --> 00:31:21,960

13 complicated not trying to be a Riddler

14 683

15 00:31:19,649 --> 00:31:25,200

16 like cumin on a very simple question

17 684

18 00:31:21,960 --> 00:31:28,489

19 what happened to Tim home Seth why can't

20 685

21 00:31:25,200 --> 00:31:28,489

22 he answer that question

23 686

24 00:31:45,550 --> 00:31:51,620

25 yeah I mean now you guys understand more

26 687

27 00:31:48,200 --> 00:31:54,350

28 why I retired as I figured out how deep

29 688

30 00:31:51,620 --> 00:31:56,780

31 this is I don't know if I want to be in

32 689

33 00:31:54,350 --> 00:31:58,250

34 DC anymore I don't even know if I want

1 690
2 00:31:56,780 --> 00:32:01,160
to be in America anymore all right these

3 691
4 00:31:58,250 --> 00:32:02,900
people tried to put me in prison the way

5 692
6 00:32:01,160 --> 00:32:05,510
they did to Tim home set that appears

7 693
8 00:32:02,900 --> 00:32:07,970
simply because I read John Podesta C

9 694
10 00:32:05,510 --> 00:32:10,460
mails and Julian Assange is rotting away

11 695
12 00:32:07,970 --> 00:32:13,160
and nobody seems to care he's in

13 696
14 00:32:10,460 --> 00:32:16,179
solitary confinement in Belmarsh and the

15 697
16 00:32:13,160 --> 00:32:18,320
UK awaiting transferred here in the US

18 698
19 00:32:16,179 --> 00:32:20,690
and it's like nobody cares anymore

20 699
21 00:32:18,320 --> 00:32:24,040
everybody's all happy with why he's so

23 700
24 00:32:20,690 --> 00:32:24,040
happy that there's no justice

25 701
26 00:32:49,330 --> 00:32:55,029
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 81

1 and it's it's sunny Robert Steele that

2 702

3 00:32:52,659 --> 00:32:56,379

4 phone conversation with him before he

5 703

6 00:32:55,029 --> 00:32:58,179

started getting nasty

7 704

8 00:32:56,379 --> 00:33:01,299

before I started getting nasty with me

9 705

10 00:32:58,179 --> 00:33:04,330

11 weird he tells me that I should I should

12 706

13 00:33:01,299 --> 00:33:06,580

team up with Dustin Deimos and he's like

14 707

15 00:33:04,330 --> 00:33:08,169

Dustin emotes working on hole watch

16 708

17 00:33:06,580 --> 00:33:09,039

18 illegal stuff to take down the

19 709

20 00:33:08,169 --> 00:33:11,499

censorship

21 710

22 00:33:09,039 --> 00:33:13,899

23 Dustin Deimos you mean the felon dust

24 711

25 00:33:11,499 --> 00:33:15,639

and Krieger you mean cute art felon dust

26 712

27 00:33:13,899 --> 00:33:16,720

28 and Krieger but I don't believe even

1 713
2 00:33:15,639 --> 00:33:19,029

voting for Trump

3 714

4 00:33:16,720 --> 00:33:20,499

5 Fallon Dustin Krieger you mean him the

6 715

7 00:33:19,029 --> 00:33:21,789

guy who's been reading your posts about

8 716

9 00:33:20,499 --> 00:33:23,679

10 me for the last year and a half

11 717

12 00:33:21,789 --> 00:33:27,429

calling me fake Mogga and evil and all

13 718

14 00:33:23,679 --> 00:33:31,090

this stuff okay to serial felon dust the

15 719

16 00:33:27,429 --> 00:33:34,570

17 Krieger I don't want to work with him or

18 720

19 00:33:31,090 --> 00:33:36,759

many also Robert David Steele asked me

20 721

21 00:33:34,570 --> 00:33:38,859

22 if I want to testify if I want to

23 722

24 00:33:36,759 --> 00:33:41,440

testify for his court case against

25 723

26 00:33:38,859 --> 00:33:43,809

Goodman no I don't want to testify if

27 724

28 00:33:41,440 --> 00:33:45,789

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 83

1 you dragged me in to testify I'm gonna

2 725

3 00:33:43,809 --> 00:33:48,129

4 tell the judge and I'm gonna tell the

5 726

6 00:33:45,789 --> 00:33:49,929

7 jury that I think you're a fat fraud I

8 727

9 00:33:48,129 --> 00:33:52,690

10 think you're a fat frog who may have

11 728

12 00:33:49,929 --> 00:33:54,609

13 never fully left the CIA and I think you

14 729

15 00:33:52,690 --> 00:33:56,289

16 have a little scheme to destroy truthers

17 730

18 00:33:54,609 --> 00:33:57,999

19 you don't have the resources to deal

20 731

21 00:33:56,289 --> 00:33:59,830

22 with this shit and that's what I believe

23 732

24 00:33:57,999 --> 00:34:02,109

25 that's what I truly believe at this

26 733

27 00:33:59,830 --> 00:34:03,999

28 point in time given the information that

734

00:34:02,109 --> 00:34:05,950

we've surfaced and so if you're to have

735

00:34:03,999 --> 00:34:08,619

me testify in your court case Robert

1 736
2 00:34:05,950 --> 00:34:10,599
David Steele you fat swamp hog you

3 737
4 00:34:08,619 --> 00:34:13,960
5 already have me testify I don't think

6 738
7 00:34:10,599 --> 00:34:15,639
it'd work out in your favor and I think

8 739
9 00:34:13,960 --> 00:34:18,129
10 you're an anti-semite Robert David

11 740
12 00:34:15,639 --> 00:34:20,290
Steele your random outbursts about Jews

13 741
14 00:34:18,129 --> 00:34:22,359
and stuff I don't think testifying would

15 742
16 00:34:20,290 --> 00:34:25,270
17 really go in your favorite and I'm not a

18 743
19 00:34:22,359 --> 00:34:27,520
person who really cares not a person who

20 744
21 00:34:25,270 --> 00:34:30,129
22 cares that much when people criticize my

23 745
24 00:34:27,520 --> 00:34:32,559
my background I don't really care they

25 746
26 00:34:30,129 --> 00:34:35,559
just the whole the whole cake together

27 747
28 00:34:32,559 --> 00:34:37,869
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 85

1 this fat hog this fat hog go he's

2 748

3 00:34:35,559 --> 00:34:40,389

4 rambling about AIPAC and the Israelis

5 749

6 00:34:37,869 --> 00:34:43,030

7 and stuff this fat hog tried to destroy

8 750

9 00:34:40,389 --> 00:34:45,429

10 me it appears just because I read put us

11 751

12 00:34:43,030 --> 00:34:49,419

13 as emails and it appears that he also

14 752

15 00:34:45,429 --> 00:34:50,770

16 misled Tim home set and when when he

17 753

18 00:34:49,419 --> 00:34:53,109

19 says I don't like where this is leading

20 754

21 00:34:50,770 --> 00:34:54,940

22 and then it starts yelling at me and

23 755

24 00:34:53,109 --> 00:34:58,089

25 hangs up I don't like where this is

26 756

27 00:34:54,940 --> 00:35:00,250

28 heading what does that even mean I'm not

29 757

30 00:34:58,089 --> 00:35:01,359

31 a prosecutor you start freaking out on

32 758

33 00:35:00,250 --> 00:35:02,290

34 me and said I don't like where this is

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 86

1 759
2 00:35:01,359 --> 00:35:04,930
going

3 760
4 00:35:02,290 --> 00:35:07,750
where is this going wait a second wait a

5 761
6 00:35:04,930 --> 00:35:10,930
7 second here huh let me be Columbo for a

8 762
9 00:35:07,750 --> 00:35:13,660
second one more question mr. Steele are

10 763
11 00:35:10,930 --> 00:35:16,000
12 you referring truthers who cover Podesta

13 764
14 00:35:13,660 --> 00:35:19,720
and the Clintons to expensive

15 765
16 00:35:16,000 --> 00:35:21,910
17 complicated litigation with with with

18 766
19 00:35:19,720 --> 00:35:24,190
this are you referring them it's a

20 767
21 00:35:21,910 --> 00:35:26,710
22 complex litigation for the sole intent

23 768
24 00:35:24,190 --> 00:35:36,460
of bringing those people down simple

25 769
26 00:35:26,710 --> 00:35:39,160
question but I don't mean to seem like a

27 770
28 00:35:36,460 --> 00:35:41,140
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 87

1 snowflake retiring on you guys don't

2 771

3 00:35:39,160 --> 00:35:44,140
mean to be a snowflake it's after

4

5 772

6 00:35:41,140 --> 00:35:45,820
finding out that he used to you sort

7 773

8 00:35:44,140 --> 00:35:46,330
with the Clintons I can't deal with this

9

10 774

11 00:35:45,820 --> 00:35:48,250
anymore

12

13 775

14 00:35:46,330 --> 00:35:50,020
I don't I'm done with videos just doing

15

16 776

17 00:35:48,250 --> 00:35:52,330
this there's a public record of what was

18

19 777

20 00:35:50,020 --> 00:35:53,740
done to me I'm done with this keep

21

22 778

23 00:35:52,330 --> 00:35:55,720
reading the website because we're gonna

24

25 779

26 00:35:53,740 --> 00:35:57,880
we're gonna keep putting articles out on

27

28 780

00:35:55,720 --> 00:36:01,870
their article coming out tomorrow night

781

00:35:57,880 --> 00:36:04,060
a new one on the homepage and as far as

1 782
2 00:36:01,870 --> 00:36:07,420
me I'm done you know this is no longer

3 783
4 00:36:04,060 --> 00:36:09,070
fun for me if I had a fear of death

5
6 784
7 00:36:07,420 --> 00:36:10,660
would be a little bit scary but I don't

8 785
9 00:36:09,070 --> 00:36:12,100
these peda bores I don't like what

10
11 786
12 00:36:10,660 --> 00:36:14,200
they've done don't like they've done

13 787
14 00:36:12,100 --> 00:36:16,270
with my country or with the political

15 788
16 00:36:14,200 --> 00:36:17,830
situation and I don't fear them even a

18 789
19 00:36:16,270 --> 00:36:19,540
little bit and if they were to come here

20 790
21 00:36:17,830 --> 00:36:24,640
and try to harm me I don't think you

22
23 791
24 00:36:19,540 --> 00:36:26,980
would n12 for them and I appreciate the

25 792
26 00:36:24,640 --> 00:36:27,790
support so far but I know this is where

27
28 793
29 00:36:26,980 --> 00:36:30,460
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 89

1 it ends for me

2 794

3 00:36:27,790 --> 00:36:32,290

4 these I put my faith in this man Stephen

5 795

6 00:36:30,460 --> 00:36:33,970

7 Scott this I put a lot of faith in him

8 796

9 00:36:32,290 --> 00:36:35,650

10 that I normally would not put in the

11 797

12 00:36:33,970 --> 00:36:38,980

13 person that I don't know that well the

14 798

15 00:36:35,650 --> 00:36:40,810

16 Robert Steele and Steve this is wife

17 799

18 00:36:38,980 --> 00:36:43,570

19 telling me how much they care about my

20 800

21 00:36:40,810 --> 00:36:46,900

22 journalism I bought it hook line and

23 801

24 00:36:43,570 --> 00:36:48,760

25 sinker auto hook line and sinker and I

26 802

27 00:36:46,900 --> 00:36:51,220

28 was almost taken to the slaughter

29 803

30 00:36:48,760 --> 00:36:53,470

31 thankfully some strong intuition

32 804

33 00:36:51,220 --> 00:36:56,320

34 combined with a few watchful protectors

1 805

2 00:36:53,470 --> 00:36:57,040

3 it is true that not everybody in DC is

4 806

5 00:36:56,320 --> 00:36:58,900

6 total garbage

7 807

8 00:36:57,040 --> 00:37:03,100

9 because I have some watch the protectors

10 808

11 00:36:58,900 --> 00:37:06,670

12 who said hey this is not this is not

13 809

14 00:37:03,100 --> 00:37:08,230

15 adding up at all you know and thankfully

16 810

17 00:37:06,670 --> 00:37:10,030

18 I have those people to say you got a

19 811

20 00:37:08,230 --> 00:37:11,410

21 look you gotta look at the downside like

22 812

23 00:37:10,030 --> 00:37:13,570

24 that former judge telling me that I

25 813

26 00:37:11,410 --> 00:37:15,850

27 could have been hit then have been hit

28 814

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 91

00:37:13,570 --> 00:37:18,370

with with fines for go

29 815

30 00:37:15,850 --> 00:37:20,710

31 in their pro se I kiss a case this

32 816

33 00:37:18,370 --> 00:37:22,720

1 okay

2 have you had an opportunity to review 12

3 00:01:05,180 --> 00:01:10,320

4 this document background information on Robert David Steele and the other people

5 13

6 00:01:10,320 --> 00:01:18,689

were going to talk about yeah I did review what you sent me today had an

7 14

8 00:01:18,689 --> 00:01:29,090

9 opportunity to to look through it little convoluted here is what appears to be a

10 15

11 00:01:29,090 --> 00:01:35,880

real screwy situation with this guy you know yeah so you don't recognize this

12 16

13 00:01:35,880 --> 00:01:40,020

individual you never worked with him in the development of the NATO open-source

14 17

15 00:01:40,020 --> 00:01:47,520

intelligence handbook as he claims

16 I do not know this guy as far as I know

17 18

18 00:01:47,520 --> 00:01:54,500

I may have run across him but I do not know Steele or any of the other people

19 19

20 00:01:54,509 --> 00:02:00,080

21 that that you sent me information on right but of course in the book the NATO

22 20

23 00:02:00,090 --> 00:02:04,680

open-source intelligence handbook you reference this open source solutions

24 21

25 00:02:04,680 --> 00:02:09,680

26 company as a contributor is that correct?

27 22

28 00:02:09,680 --> 00:02:20,760

the the pamphlet that that was done by SACLANT was a collaborative effort by
DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 104

1
23

3 00:02:20,770 --> 00:02:30,390

4 the the SACLANT staff which of course was a multinational staff that was done

5
24

6 00:02:30,390 --> 00:02:41,560

7 for the the joint and multinational command that that I commanded of course

8
25

9 00:02:41,560 --> 00:02:47,620

10 I put the forward on it I was asked if I wrote that I did not it was a

11
26

12 00:02:47,620 --> 00:02:55,240

13 collaborative effort by by the SACLANT staff right and in this paragraph

14
27

15 00:02:55,240 --> 00:03:01,540

16 in your forward you say this publication has benefited greatly from the continued

17
28

18 00:03:01,540 --> 00:03:07,810

19 collaboration between my staff and the staff of open source solutions inc I

20
29

21 00:03:07,810 --> 00:03:12,880

22 think this is the main source of disagreement between Robert David Steele

23
30

24 00:03:12,960 --> 00:03:20,260

25 and the reporting that we've done he claims that he is somehow part of open

26
31

27 00:03:20,260 --> 00:03:28,520

28 source solutions but I'm unable to find

any information online to corroborate what he says

29
32

30 00:03:30,720 --> 00:03:38,860

31 well I know nothing about Steele having anything to do with writing this and I

32
33

34 00:03:38,860 --> 00:03:47,010

35 saw where he claimed that he wrote 85% of this I find that very hard to believe

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 105

1
2
34

00:03:47,010 --> 00:03:53,680

unquestionably we do use contractors from time to time but given the type of

4
5
35

00:03:53,680 --> 00:03:58,720

document of course I'm going back eighteen years now but given the type of

6
7
36

00:03:58,720 --> 00:04:04,600

document that that was we would have used the subject matter experts from the

9
10
37

00:04:04,600 --> 00:04:09,580

SACLANT staff to put that document together so the notion that one

11
12
38

00:04:09,580 --> 00:04:14,680

individual would have written 85% of it is not compatible with what you're

14
15
39

00:04:14,680 --> 00:04:17,380

describing right?

16
17
40

00:04:17,460 --> 00:04:24,160

oh no

I find it highly unlikely that one

19
20
41

00:04:24,360 --> 00:04:31,000

person could have written that it is too complex a document for one individual to

22
23
42

00:04:31,000 --> 00:04:35,120

have written that too many different disciplines and things like that this is

24
25
43

00:04:35,220 --> 00:04:39,300

a document over 50 pages

26
27
44

00:04:39,300 --> 00:04:42,060

I'm sorry say that again

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 106

1 45

2 00:04:42,060 --> 00:04:44,600

3 it's a it's a lengthy document over 50 pages and I

4 46

5 00:04:44,720 --> 00:04:49,759

6 presume it covers too many different subjects for one person to have written

7 47

8 00:04:49,759 --> 00:04:55,220

9 the whole thing that's correct

this would have been this would have

10 48

11 00:04:55,220 --> 00:05:02,330

12 been done by various people within the staff that had staff expertise in the

13 49

14 00:05:02,330 --> 00:05:08,660

various areas of that of that document it was like I said it would have been a

15 50

16 00:05:08,660 --> 00:05:13,460

17 collaborative effort it would have been staffed numerous times within the within

18 51

19 00:05:13,460 --> 00:05:20,160

the headquarters and then subsequently approved by the by the chief of staff

20 52

21 00:05:20,160 --> 00:05:27,460

before it went to me for final approval mm-hmm and do you recall speaking well

22 53

23 00:05:27,470 --> 00:05:32,060

24 sorry it was an email communication with this person who presented herself as Pat

25 54

26 00:05:32,060 --> 00:05:39,260

Ingraham who I believe is Susan Lutzke you remember that email exchange right?

27 55

28 00:05:39,280 --> 00:05:47,380

Yeah, I just vaguely remember that that conversation or email

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 107

1 56

2 00:05:47,380 --> 00:05:52,340

3 I don't recall whether it was a

4 telephone conversation or an email but I

5 57

6 00:05:52,340 --> 00:05:58,130

7 was basically asked if if I wrote that and I think I told her or the same thing

8 58

9 00:05:58,130 --> 00:06:06,500

that all I did was put the forward on it that this was a staff effort by by

10 59

11 00:06:06,500 --> 00:06:10,460

12 SACLANT yeah

separately I've been in touch with Susan

13 60

14 00:06:10,460 --> 00:06:14,820

Lutzke she's shared the email between you and

15 61

16 00:06:14,820 --> 00:06:19,460

17 her that's how I got your email address that's how you and I got in touch for

18 62

19 00:06:19,460 --> 00:06:23,020

this phone call so I believe she was deceiving you there and I'm not sure

20 63

21 00:06:23,020 --> 00:06:28,180

22 exactly what her purpose was but she is not Pat Ingraham

23 64

24 00:06:29,160 --> 00:06:33,520

Yeah I was very surprised

25 65

26 00:06:33,620 --> 00:06:42,620

when I got that that request from her these documents these manuals and staff

27 66

28 00:06:42,620 --> 00:06:51,080

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 108

1 documents are always done as a collaborative effort by the staff you

2 67

3 00:06:51,080 --> 00:06:58,099

4 know as a commander I might sign off on it to bring attention to the fact that

5 68

6 00:06:58,099 --> 00:07:04,580

7 this is an important document and approved at at the headquarters level

8 69

9 00:07:04,580 --> 00:07:13,130

10 but obviously it's not something that that me as the commander wrote right and

11 70

12 00:07:13,130 --> 00:07:17,900

13 would you have directly interfaced with individuals who did write it or you're

14 71

15 00:07:17,900 --> 00:07:21,820

16 just sort of overseeing it as a project?

17 72

18 00:07:22,380 --> 00:07:33,560

19 right okay hang on just a minute my phone that captures your voice

20 73

21 00:07:33,560 --> 00:07:42,340

22 message is being delayed but... I can rephrase I don't know why this

23 74

24 00:07:42,340 --> 00:07:50,500

25 individual would indicate that he wrote this because these these type

26 75

27 00:07:50,500 --> 00:07:58,140

28 manuals are always something that that is done at a staff level I see I see

76

00:07:58,160 --> 00:08:04,510

and the third individual David George Sweigert retired US Air Force and

77

00:08:04,510 --> 00:08:09,900

contract employee of various agencies have you ever seen this guy before?

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 109

1
78

2 00:08:11,060 --> 00:08:14,740

3 I don't know this individual at all

4
79

5 00:08:14,780 --> 00:08:21,100

6 yeah I mean I you know you've got good pictures on him and everything else

7
80

8 00:08:21,100 --> 00:08:29,150

9 obviously somebody that also was a defense contractor from time to time he

10
81

11 00:08:29,150 --> 00:08:33,560

12 could have been in the headquarters but I never I never recalled meeting him or

13
82

14 00:08:33,560 --> 00:08:40,920

15 seeing him

16 could've he had a a periodic contract

17
83

18 00:08:40,920 --> 00:08:45,660

19 at Booz Allen Hamilton or somebody like that working in the headquarters yes but

20
84

21 00:08:45,660 --> 00:08:50,130

22 I don't I don't remember ever meeting him of course I'm just trying to

23
85

24 00:08:50,130 --> 00:08:54,300

25 determine why these individuals would have selected this book I mean they're

26
86

27 00:08:54,300 --> 00:09:01,019

28 so persistent in their efforts to stop me from reporting on things their

29
87

30 00:09:01,019 --> 00:09:06,600

31 explanation of simply not liking my news program can't possibly be the real

32
88

33 00:09:06,600 --> 00:09:11,550

34 explanation for their multiple lawsuits they've brought against me and constant

1 89

2 00:09:11,560 --> 00:09:15,020

3 harassment and defamation

4 so listen General thank you very much

5 90

6 00:09:15,020 --> 00:09:18,320

7 for your time I think that's really all I needed to ask you I really appreciate

8 91

9 00:09:18,320 --> 00:09:25,320

10 you sharing that information with me and I hope you feel alright and can get

11 92

12 00:09:25,320 --> 00:09:28,000

13 some treatment for this condition

14 93

15 00:09:28,900 --> 00:09:32,380

16 yes it's always upsetting when

17 94

18 00:09:32,380 --> 00:09:38,000

19 people take credit for other people's work why somebody unless they're just

20 95

21 00:09:38,000 --> 00:09:46,860

22 trying to fatten their resume by taking credit for something like this is beyond

23 96

24 00:09:46,860 --> 00:09:52,290

25 me why somebody would try to take this credit but it's this is obviously a

26 97

27 00:09:52,290 --> 00:10:00,860

28 staff document that was worked for months and approved by a multinational

29 98

00:10:00,860 --> 00:10:10,380

headquarters so I it's just absolutely beyond a doubt something that the

30 99

00:10:10,380 --> 00:10:15,920

headquarters put together are not one

individual I understand it's too complicated a document

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 111

100

00:10:15,920 --> 00:10:20,880

yeah one last question with regard to the lawyer representing mr. Steele this

101

00:10:20,880 --> 00:10:25,680

Steven s Biss as I mentioned in the document I have reason to believe that

102

00:10:25,680 --> 00:10:30,750

Robert David Steele has put Biss in touch with the House Intelligence

103

00:10:30,750 --> 00:10:36,320

Committee ranking member Devon Nunez and has encouraged Nunez to bring a lawsuit

104

00:10:36,320 --> 00:10:42,880

against the software company social media giant Twitter and various

105

00:10:42,880 --> 00:10:49,180

co-defendants I have reason to suspect Biss is in a regular practice of

106

00:10:49,190 --> 00:10:53,380

engaging in these fraudulent lawsuits and I'm speculating when I say this but

107

00:10:53,390 --> 00:10:58,580

I believe they're targeting mr. Nunez in an effort to damage his reputation

108

00:10:58,580 --> 00:11:04,130

because I've read their lawsuit and it has virtually no hope of succeeding it

109

00:11:04,130 --> 00:11:10,700

has already served to basically be the source of ridicule for mr. Nunez who of

110

00:11:10,700 --> 00:11:15,680

course was closely associated with championing president Trump's claims of

111

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 112

1 00:11:15,680 --> 00:11:20,120
2 innocence during the time that the Robert Mueller investigation was going on

3 112
4 00:11:20,120 --> 00:11:24,280
5 do you have any advice as to what i might be able to do to alert mr. Nunez

6 113
7 00:11:24,280 --> 00:11:29,240
I've tried contacting his office and no success

8 114
9 00:11:29,520 --> 00:11:31,900
10 that's very disappointing

11 115
12 00:11:32,800 --> 00:11:34,060
13 Yeah

14 116
15 00:11:36,240 --> 00:11:41,320
any any advice as to what I might be able to do do you have any contacts who

16 117
17 00:11:41,320 --> 00:11:47,360
could possibly raise an alert to mr.
18 Nunez as to the activities of these individuals?

19 118
20 00:11:48,200 --> 00:11:54,660
I don't the only thing that
21 I could possibly suggest that there

22 119
23 00:11:54,660 --> 00:12:02,960
there may be still a staff trail within SACLANT headquarters of the staffing

24 120
25 00:12:02,960 --> 00:12:08,030
of that document even though it's 18 years ago there still could be in the

26 121
27 00:12:08,030 --> 00:12:13,700
files you know those things are pretty heavily staffed within the headquarters

1 122

2 00:12:13,700 --> 00:12:21,290

3 and there may be something still in the files and in SACLANT the staffing of

4 123

5 00:12:21,290 --> 00:12:26,680

6 that document even though it was 18 years ago to show how that thing was

7 124

8 00:12:26,690 --> 00:12:34,460

9 ultimately approved well yeah I don't know that it would be necessary to go to

10 125

11 00:12:34,460 --> 00:12:40,100

12 those lengths I think your statements here definitely serve to counteract

13 126

14 00:12:40,100 --> 00:12:45,080

15 Robert David Steele's ridiculous claims and I definitely appreciate your time

16 127

17 00:12:45,080 --> 00:12:48,480

18 this morning general thank you very much

19 128

20 00:12:48,820 --> 00:12:53,280

21 yeah I mean it is a ridiculous claim but

22 129

23 00:12:53,580 --> 00:12:59,920

24 but if he's trying to take credit for it and and

25 130

26 00:12:59,930 --> 00:13:06,710

27 trying to use that as the defamation of character against you I mean it may be

28 131

00:13:06,710 --> 00:13:11,300

another another outlet for you yeah all right well I appreciate that I will

132

00:13:11,300 --> 00:13:15,000

follow up thank you very much sir have a good morning

133

00:13:15,000 --> 00:13:17,340

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 114

1 okay Jason good luck to you

2 134

3 00:13:17,340 --> 00:13:19,860

4 take care

EXHIBIT D

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Robert David Steele

NOMINATION FOR THE NOBEL PEACE PRIZE

Robert David Steele

For leadership in redirecting the craft of intelligence (decision-support) away from spies and secrecy enabling war and waste, toward open sources and methods favorable to peace and prosperity.

INDEX

Nomination Narrative.....	2
Nominee's Vision in Six Graphics.....	3
Nominee's Summary Biography.....	4
Nominee's Chronology.....	5
Nominee's Selected Publications.....	7

Document Properties

Description

File: NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-David-Steele.pdf
 Title:
 Author: RobertSteele
 Subject:
 Keywords:

Created: 1/11/17, 7:36:51 PM Modified: 1/11/17, 7:36:51 PM Application: Microsoft® Word 2010

Advanced

PDF Producer: Microsoft® Word 2010
 PDF Version: 1.5 (Acrobat 6.x)
 Location: Macintosh HD:Users:jasongoodman:Documents:RDS lawsuit
 File Size: 902.46 KB (924,120 Bytes)
 Page Size: 8.50 x 11.00 in
 Tagged PDF: Yes Number of Pages: 10
 Fast Web View: No

PEACE PRIZE

ele

1
2
3
EXHIBIT E
4
5

(b)(1)

From: Defango TV defango@gmail.com
Subject: Fwd: HAZMAT
Date: June 10, 2019 at 11:41 AM
To: truth@crowdsourcethetruth.org, dseaman@gmail.com

6
7
8
..... Forwarded message

From: Robert Steele <robert.david.steele.vivas@gmail.com>
Date: Fri, Jun 30, 2017 at 9:53 PM
Subject: Re: HAZMAT
To: amethystanya <amethystanya@gmail.com>, Th Stg <stgoe13@gmail.com>
Cc: Defango <Defango@gmail.com>

9
Manny, BEFORE the interview, give me a list of eleven truth tellers. I will name them online as credible sources with you being the top one.

10
On Fri, Jun 30, 2017 at 9:47 PM, amethystanya <amethystanya@gmail.com> wrote:

mango,
you are a very articulate voice of reason and the fact you live half your life on camera, makes it almost impossible for anyone to lie about you. It is hard to distinguish who is a lunatic and who is a paid who is an attention whore etc... the most prolific source of disinfo is media matters, the david brock, lyn rotheschild pipeline of horse shit. David's seaman knows a lot about this.

I think manny, you have a much better idea as to who is an authentic/ genuine than I do. I bought into the David seaman is phony but realized in his interview with you, that I was totally off base

I would give the following people as the people I firmly believe are using their own judgement but I do want to say... I am wrong a lot. BESIDES MANNY my newscasters would be:

H. A Goodman
davidT (coffee with dave)

MLordandGod
victurus libertas

William mount
davidseaman

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
Robert wants 12 good people, these are simply the ones I watch, I think manny is in a far better position to determine who those leaders of the community are - that's my viewer preferences. manny is a part of the community, is getting attacked and knows these people and has outside contact with them, I am simply an observer.

It would be cool if you took regular scheduled time to let people submit accounts they suspect to be disinfo, if they are not they can call in and discuss the accusations but go over all the available fact, and let the viewer decide HUMAN or HAZMAT

Normal people do not attack people saying things like 'Defango is a bad bad person, I am concerned what he might do to me or my family that is just not normal. Its also not legal.

because of the medium we have no means to stick a 'CONTAMINATED MATERIALS' label on people.

'until we finish our open source information platform we still have to try to distinguish who is honest'
what evidence is presented?
appeals to emotions vs intellect?
attacks others?
is angered by opposition?
grandiose conclusions... is this a huge step for the crowdsource community?
Will not rationally respond to information, when facts are brought up, they will be shout, demean mock but never ever address scripted story lines/comments
professional production videos (aka morphonius)
entertainment industry connections
attacking discrediting others

no person who watches 'WHO SPOOFED THE SETH RICH FILES' believes him to be authentic. It would be easier to create a new platform that excludes all the rigged data commercials than to separate who is and who is not crazy or paid to be wrong. we all know they are toxic but we can't get rid of them.
it has been a few weeks we need a NEW LIFE. You can't run back and run in a life right now they don't have a way in the

1
2
3
4 they do that for living. a lawsuit would create more diarrhea . at least slow the 10 posts a day. a suit against each person
5 who lies about others and the repeaters= the proceeds would fund the new thing with the proceeds. each fake actor will have to hire
6 their own legal team. pay 20k per person. where they get the money to pay their lawyers will come out in discovery= it's a trap!
7

8 WHAT TO DO TO SCARE THEM:

9
10 anyone being harassed and stalked for speaking the truth should send a detailed account of who is cyber harassing
11 you to unrig? legal. if we get enough people and the right set of facts you will be included in the lawsuits we intend to file to expose
12 this happening. put 'crowdstalked' in subject line" i can deal with that and write cases and get them filed if needed. this will really
13 hurt them. Also strongly imply that a new youtube is being created in secret. that will drive them nuts.

14 WHAT PEOPLE CAN DO TO NOT BE PART OF THE PROBLEM
15 research. books. collect information without deciding right away and being sure. collect a lot of information. If you talk about pi
16 zzagate, point to the people before you. point out the mountains of evidence that already exists. do not repeat an internet rumor, do
17 not decide what is true and false based on the words of another alone. trust your gut feeling that you are being lied to but don't
18 accuse people of things with no evidence.

19
20 people are worried about George webb so they don't hear about ted gunderson paul bonacci, caradori. This is being done on a
21 scale that makes hitler look like a novice. hundreds of children go missing from DC each month. make sure they know people have
22 not forgotten what they are working so hard to distract us from.
23
24 Tanya
25 443 875 6091

26
27
28 #UNRIG: <http://tinyurl.com/IndieGoGo-UNRIG>
29 Personal Page: <http://robertdavidsteele.com>
30 Group Blog: <http://betaicota.net>
31 Donate to Non-Profit: <http://paypal.me/EarthIntel>

32
33 Defango@gmail.com

1
2
3
EXHIBIT F
4



5
6
From: Defango TV <defango@gmail.com>
Subject: Fwd: Apology again without caveats
Date: June 18, 2019 at 11:41 AM
To: truth@crowdsourcethertruth.org, dseaman@gmail.com

7
8
..... Forwarded message

9
From: Robert Steele <robert.david.steele.vivas@gmail.com>
Date: Mon, Dec 4, 2017 at 6:28 PM
Subject: Re: Apology again without caveats
To: Defango <defango@gmail.com>

10
should I ask Tyrone for the access information? Steve asked me not to contact him. what's the least troubling way to "take
11 possession" of the channel? direct from Tyrone?

12
On Mon, Dec 4, 2017 at 6:27 PM, Defango <defango@gmail.com> wrote:
13
In the last month I have generated over 1k in bitcoin posting my content on steemit regularly and using the platform. I have a small
channel on steemit with only the posts I have. If you started just copy and pasting your content over to steemit and kept active you
could be doing 3 times that with little to no problem. Steemit just a new platform that people are using for good and it doesn't matter
if they are old articles of yours, they still will generate incoming on the platform. It's the decentralized platform that you're looking for, it
has all the things it needed to fully design and use any open source systems. They just need to be created and connected.

14
On Mon, Dec 4, 2017 at 4:11 PM, Robert Steele <robert.david.steele.vivas@gmail.com> wrote:
15
PLEASE calm Tanya for me. You can tell her I am your bitch now (smile)

16
On Mon, Dec 4, 2017 at 6:00 PM, Defango <defango@gmail.com> wrote:
17
Thanks A Lot.

I was not my intention to hurt you, but I just wanted to clear the air for many people and it seems we had good stopping point.

Bless you for all you have done and I know things are going to be better in the future. Take some time and collect yourself
because January is going to be a very busy time for all of us

The video should be edited down and I will keep myself quite on the subject until it seems like it's safe to talk about it. I'm just
going all in on deflecting any negative comments from Goodman's crowd. He fell for a trap I set for him and it's not looking
good for him.

You just need to start posting on steemit. Sure month one will be nothing, but if you spend the next month moving over content
from your website, I can be honest and say you could be generating over 7k a month and crypto.

18
19
On Mon, Dec 4, 2017 at 10:56 AM, Robert Steele <robert.david.steele.vivas@gmail.com> wrote:
Bless you. I fucked up and it was not at all my intention to be insulting to you. Absolutely NOT.

20
I will do whatever you wish including if you direct me, posting an apology with no caveats at the video (which you can leave
up or not as you please) and doing a future live stream or not. I am about to disappear from public view for 30 days, from
Saturday.

21
I will not mention the video again. If asked by another host about it I will say I screwed up and have apologized to you three
times, profusely, I was completely in the wrong in how I spoke. Count on me to be honorable with you

22
Also, Trevor just reminded me that I had offered you the bus ride, and that is absolutely still yours if you wish. I am waiting
on Cynthia to decide about coming back to the USA. I will do an email now cc you that puts this back on the table with her.

23
On Steemit, I will follow your lead and do whatever you tell me to do.

24
My heart is lighter for re-connecting with you. It was NEVER my intent to disrespect you or your channel, I was stupid and
clumsy.

25
Robert

26
On Mon, Dec 4, 2017 at 12:39 PM, Defango <defango@gmail.com> wrote:
I accept the apology. We will figure what do next

27
On Dec 4, 2017 8:18 AM, "Robert Steele" <robert.david.steele.vivas@gmail.com> wrote:
Manu

I apologize again, with no caveats. What can I do to make it right? Will hope to hear from you.

Both Steve and Cynthia are united with you and hold me accountable for being completely wrong in this past encounter.

Very respectfully,

Robert

--
#UNRIG Home: <http://unrig.net>
#UNRIG Donate: <http://tinyurl.com/IndieGoGo-UNRIG>
Personal Page: <http://robertdavidsteele.com>
Group Blog: <http://phibetaiota.net>
Donate to Non-Profit: <http://paypal.me/EarthIntel>

--
#UNRIG Home: <http://unrig.net>
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Personal Page: <http://robertdavidsteele.com>
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Donate to Non-Profit: <http://paypal.me/EarthIntel>

--
Defango@gmail.com



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#UNRIG Home: <http://unrig.net>
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Personal Page: <http://robertdavidsteele.com>
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Defango@gmail.com



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Personal Page: <http://robertdavidsteele.com>
Group Blog: <http://phibetaiota.net>
Donate to Non-Profit: <http://paypal.me/EarthIntel>

--
Defango@gmail.com

1 EXHIBIT G
2
3



4 From: Defango TV defango@gmail.com
5 Subject: Fwd: sorry!
6 Date: June 18, 2019 at 11:44 AM
7 To: truth@crowdsourcethetruth.org, dseaman@gmail.com

8 ----- Forwarded message -----
9 From: amethetanya <atanya1111@gmail.com>
10 Date: Sun, Jul 2, 2017 at 8:49 AM
11 Subject: sorry!
12 To: Defango <Defango@gmail.com>

13 So I love Robert but he moves way to fast. I was just having lunch and talking about how viewers discern things and why you are the
14 best one basically (let's face facts you are a good 50 IQ points > rest) I'm slammed busy with life as I'm sure you are but also with kids
15 and a husband (that's like 3 kids) so if him deciding TOMORROW was a pain in your butt I do apologize.

16 I'm sitting here writing defamation cases for my husband for policemen and thinking I can in three days get you a case against
17 Jason. I'm guessing a half a million bucks they will throw at you to just make it go away = catch it! Robert is the real deal he can go
18 to court for you. And will. that is cool thing about him. He drove 3 hours to come see me on the farm (terrified honestly) and hung out
19 all day, seemingly unaffected my friends showing up and doing bong hits.

20 I had written the most killer case against jake-crisis-actcr-morphonius. I will have Nora (maccoby) send you a copy (I cant). They
21 called her dad a child trafficker, while her whole family is in the hospital (her mom is dying) her brother is a lawyer who repped
22 alefantis against david brock in their "divorce" but apparently HE blackmailed BROCK and is NOT a pedo??? just a fudge packer.
23 NOT THAT THERE'S ANYTHING WRONG WITH THAT***

24 Max, her brother was the one who eventually would not let her file against morphonius because his corporate overlords didn't want the
25 publicity. the lawsuit he is waving around on his channel, I wrote that. Nora had started trying to help Robert get to trump because
26 she lives like a few doors down from Pense's guards (I call them spear holders because he is a notorious fag) when her family came
27 under intense fire from media matters. THE ONLY person who knew the stuff in the highly produced morphonius pieces was brock.
28 anyways then she got in a huge fight with Robert over the pedo thing, the details of which escape me. So I was a little wary with
anyways helping Robert because I think the attack against her family was because they were trying to help him. and I still want to go after
anyways media matters, get them off youtube and get the victims of the slander paid.

anyways do contemplate suing Jason, he's likely insured. You have a great case.

TT

***totally is lots wrong with it. poop on the sheets for instance.

Defango@gmail.com

EXHIBIT H

Lestat' folly amabiss - net4truth ha Goodman defango - greedy vampires money grab

438 views

ALEXANDRE LANDRY 2018-06-01 Raid

Alice Wonderland \$1.37 2017-08-31 Declined

AnaBiss 2017-08-01 Raid

37.2K views 610 subscribers

Up next

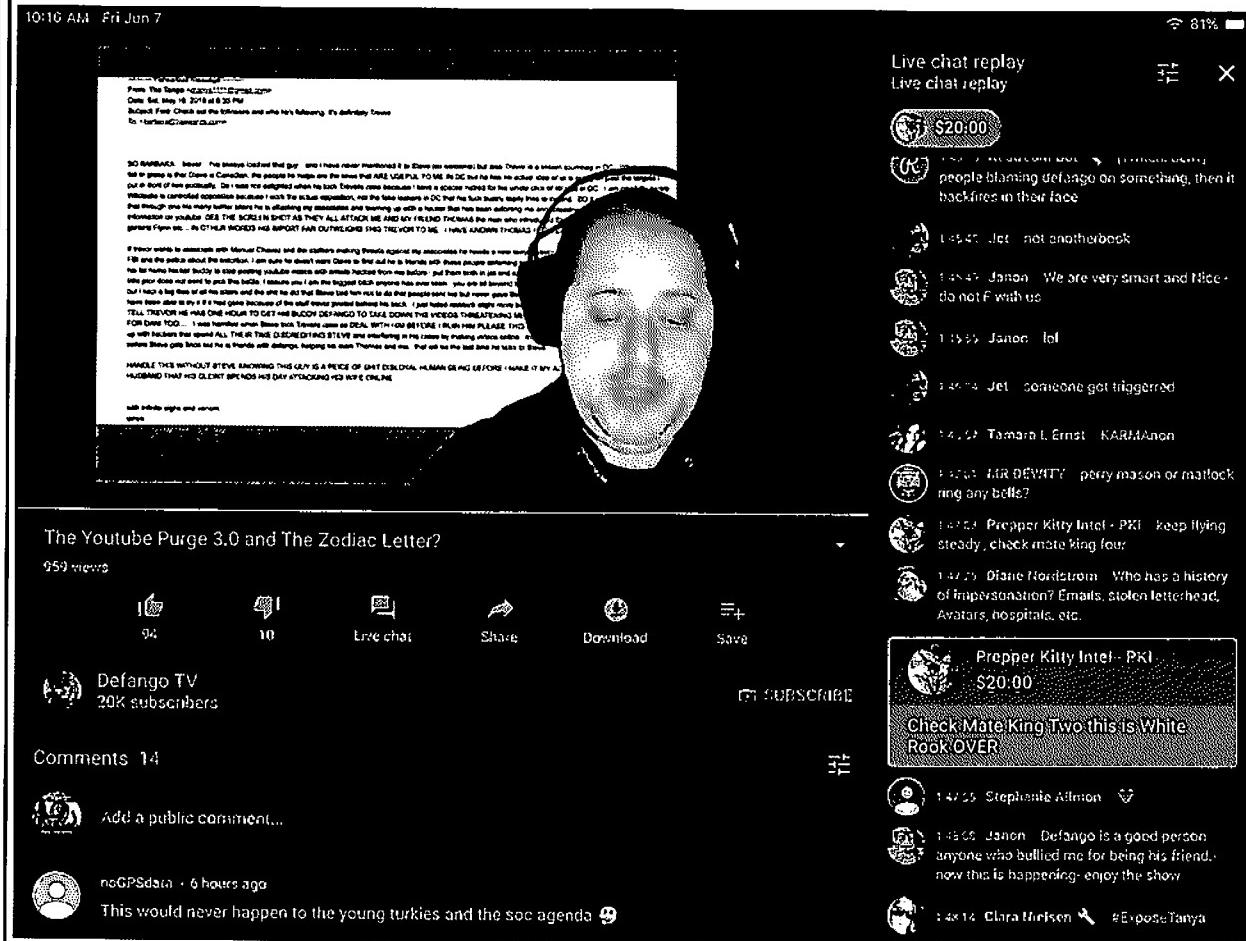
It Will Be Done By 2030

The Daily Briefing With Donald Trump 5/26/19 | The Daily Briefing

Sade - Soldier Of Love (Official Music Video)

President Trump URGENT! I AM PRESIDENT TRUMP!

EXHIBIT I



DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 123

1 EXHIBIT J
2

3 ••••• AT&T LTE 2:23 PM 57% 
4 < 15/19 2 Messages Your July 3rd Tour ^ v
5 Found in All Mail Mailbox 

6 Robert Steele 7/7/17 
7 To: George Webb Details
8

9 George, for information. A
10 massive law suit is about to be
11 filed against Jason Goodman
12 by a lawyer who specializes in
13 defamation cases. Manny is
14 the one who will be in front, my
15 case will simply be in support.
16 Jason is buried so deep by his
17 own words that we expect
18 Google to shut him down
19 completely -- close his
20 channel and delete all of his
21 videos. Since the videos
22 appear in all states this will be
23 a multi-state filing, done pro

24     
25
26
27
28

Circuit Court for Eastern Division VirginiaCase No. 3:17-cv-601-MHL

City or County

Robert David Steele and Earth Intelligence Network

Name				
11005 LANGTON ARMS CT				
Street Address	Apt #			
OAKTON,	VA	22124	(571)	320-8573
City	State	Zip Code	Area Code	Telephone

VS.

Jason Goodman

Name				
252 7th avenue	6s			
Street Address	Apt.#			
New York	NY	10001	(323)	744-7594
City	State	Zip Code	Area Code	Telephone

*Plaintiff**Defendant***CERTIFICATE OF SERVICE**

(DOMREL58)

I HEREBY CERTIFY that on this 5 day of July, 2019, a copy
 of the document(s) entitled DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11
 SANCTIONS

Title of Document(s)
 was/were mailed, postage prepaid to:

Terry Frank Kaufman & CanolesOpposing Party or His/Her Attorney1021 E. Cary Street, 14th FloorAddressRichmond
CityVA
State23219
ZipJuly 5, 2019
DateSignature

Circuit Court for Eastern Division VirginiaCase No. 3:17-cv-601-MHLCity or County
Robert David Steele and Earth Intelligence Network

Name				
11005 LANGTON ARMS CT				
Street Address	Apt #			
OAKTON,	VA	22124	(571)	320-8573
City	State	Zip Code	Area Code	Telephone

VS.

Jason Goodman

Name				
252 7th avenue	6s			
Street Address	Apt #			
New York	NY	10001	(323)	744-7594
City	State	Zip Code	Area Code	Telephone

*Plaintiff**Defendant***CERTIFICATE OF SERVICE**

(DOMREL58)

I HEREBY CERTIFY that on this 5 day of July, 2019, a copy of the document(s) entitled DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS

Title of Document(s)
was/were mailed, postage prepaid to:

D. George SweigertOpposing Party or His/Her AttorneyPO Box 152Address

Mesa	AZ	85211
City	State	Zip

July 5, 2019DateSignature


Circuit Court for Eastern Division VirginiaCase No. 3:17-cv-601-MHL

City or County

Robert David Steele and Earth Intelligence Network

Name				
11005 LANGTON ARMS CT				
Street Address	Apt #			
OAKTON,	VA	22124	(571)	320-8573
City	State	Zip Code	Area Code	Telephone

Plaintiff

VS.

Jason Goodman

Name				
252 7th avenue				
Street Address	Apt #			
New York	NY	10001	(323)	744-7594
City	State	Zip Code	Area Code	Telephone

*Defendant***CERTIFICATE OF SERVICE**

(DOMREL58)

I HEREBY CERTIFY that on this 5 day of July, 2019, a copy of the document(s) entitled DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS.

Title of Document(s)
was/were mailed, postage prepaid to:

Susan Lutzke HolmesOpposing Party or His/Her Attorney2608 Leisure Dr Unit BAddress

Fort Collins	CO	80525
City	State	Zip

July 5, 2019
Date

Signature



Circuit Court for Eastern Division Virginia**Case No.** 3:17-cv-601-MHL**City or County**

Robert David Steele and Earth Intelligence Network

Name				
11005 LANGTON ARMS CT				
Street Address	Apt #			
OAKTON,	VA	22124	(571)	320-8573
City	State	Zip Code	Area Code	Telephone

VS.

Jason Goodman

Name				
252 7th avenue	6s			
Street Address	Apt #			
New York	NY	10001	(323)	744-7594
City	State	Zip Code	Area Code	Telephone

Plaintiff**Defendant**

CERTIFICATE OF SERVICE (DOMREL58)

I HEREBY CERTIFY that on this 5 day of July, 2019, a copy of the document(s) entitled DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS

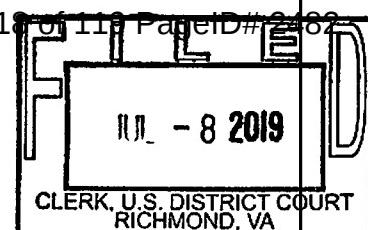
Title of Document(s)
was/were mailed, postage prepaid to:

Steven S BissOpposing Party or His/Her Attorney300 West Main Street Suite 102Address

Charlottesville	VA	22903
City	State	Zip

July 5, 2019
Date

Signature

1 IN THE UNITED STATES DISTRICT COURT
2

3 FOR THE EASTERN DISTRICT OF VIRGINIA
4

RICHMOND DIVISION

5 ROBERT DAVID STEELE, et al.,

Case No.: 3:17-cv-00601-MHL

6 Plaintiff,

7 vs.

DEFENDANT'S SWORN STATEMENT

8 JASON GOODMAN, et al.,

9 Defendant

11 DEFENDANT'S SWORN STATEMENT

13 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.

14 Further, I hereby attest that the attached exhibits are accurate and true copies of source
15 documents as described. Video and telephone recording transcripts may contain typos due to
16 voice to text transcription software. True and accurate copies of original video and audio
17 recordings can be provided should it please the court.

19 Signed this 5 day of July 2019

21
22 Defendant, Pro Se Jason Goodman

25 Jason Goodman, Pro Se
26 252 7th Avenue Apt 6s
27 New York, NY 10001
truth@crowdsourcethetruth.org

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff(s),

v.

JASON GOODMAN, et al.,

Defendant(s).

Civil Action Number: 3:17-cv-00601-MHL

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of _____

DEFENDANT'S AMENDED
RESPONSE TO PLAINTIFF'S
MOTION FOR RULE 11
SANCTIONS

JASON GOODMAN
Name of *Pro Se* Party (Print or Type)


Signature of *Pro Se* Party

Executed on: July 5 2019 _____ (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)
Prepared, or assisted in the preparation of, this document

(Name of *Pro Se* Party (Print or Type))

Signature of *Pro Se* Party

Executed on: _____ (Date)